

**First Amendment to the  
Draft  
Supplemental  
Environmental Impact Report**



**NORMAN Y. MINETA**

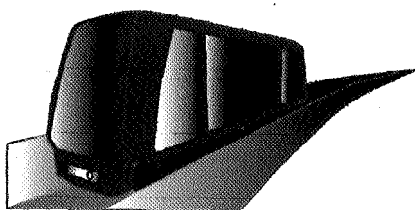
**SAN JOSE**

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**INTERNATIONAL**

**A I R P O R T**

**MASTER PLAN UPDATE**



**January 2003  
SCH# 1999073066**

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## SECTION 1. INTRODUCTION

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This document, together with the Draft Supplemental Environmental Impact Report (DSEIR), constitutes the Final Supplemental Environmental Impact Report (FSEIR) for the *Norman Y. Mineta San Jose International Airport Master Plan Update*. The DSEIR was circulated to affected public agencies and the general public for a 45-day period, beginning on October 9, 2002 and ending on November 22, 2002.

This First Amendment to the DSEIR consists of comments received by the City of San Jose on the DSEIR, responses to those comments, and revisions to the text of the DSEIR.

In conformance with the CEQA Guidelines, the FSEIR provides objective information regarding the environmental consequences of the proposed project. Where significant environmental impacts are identified, mitigation measures are also identified.

## SECTION 2. RESPONSES TO COMMENTS RECEIVED ON THE DRAFT SUPPLEMENTAL EIR

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Sixteen written comments on the Draft Supplemental EIR were received during the public review period. A copy of each comment has been reproduced on the following pages, followed by the response to the issue(s) raised in the comment. The portions of each comment requiring a response have been marked with brackets and letters, which correspond to the responses to the comments.

The reader will note that some responses to comments are simply "comment noted". This response is made where the comment pertains to issues other than the adequacy of the EIR. For example, if a comment expresses an opinion about the merits of the project itself, the response is to note and acknowledge that comment for the record. CEQA requires in-depth responses only where environmental issues pertaining to the adequacy of the EIR are raised in a comment.

Comment & Response  
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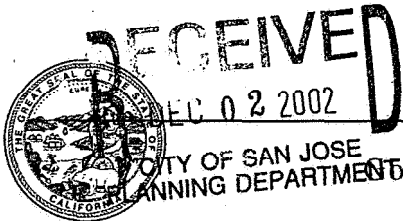
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Gray Davis  
Governor

Section 2 - Responses to Comments  
STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse



Tal Finney  
Interim Director

November 26, 2002

COMMENT  
# 1

Janis Moore  
City of San Jose  
801 North First Street  
San Jose, CA 95110-1795

Subject: San Jose International Airport Master Plan Update  
SCH#: 1995073066

Dear Janis Moore:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on November 25, 2002, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts  
Director, State Clearinghouse

Enclosures  
cc: Resources Agency

**Document Details Report**  
**State Clearinghouse Data Base**

*Section 2 - Responses to Comments*

**SCH#** 1995073066  
**Project Title** San Jose International Airport Master Plan Update  
**Lead Agency** San Jose, City of

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**Type** SIR Supplemental EIR

**Description** The SJC and the location of the APM site is generally bounded by Airport Boulevard, I-880, Coleman Avenue, De la Cruz Boulevard, U.S. 101 and North First Street. The project consists of an update to the Norman Y. Mineta San Jose International Airport (SJC) Master Plan to allow the construction of the Off-Airport Elevated Automated People Mover (APM) which will be located between the SJC and the Santa Clara Valley Transportation Authority (VTA) Metro/Airport Light Rail Transit (LRT) Station on North First Street. The APM is intended as a mitigation measure for SJC-generated traffic and air-quality impacts by providing a non-roadway mode of access to and from the SJC for air passengers and employees. The SJC contains approximately 1000 acres and the proposed alignment for the APM is approximately 0.6 miles in length. The SEIR will also contain an update to the noise analysis that was contained in the 1997 EIR.

---

**Lead Agency Contact**

**Name** Janis Moore  
**Agency** City of San Jose  
**Phone** 408-277-4576 **Fax**  
**email**  
**Address** 801 North First Street  
**City** San Jose **State** CA **Zip** 95110-1795

---

**Project Location**

**County** Santa Clara  
**City** San Jose  
**Region**  
**Cross Streets** Airport Boulevard and I-880  
**Parcel No.** Various  
**Township** **Range** **Section** **Base**

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**Proximity to:**

**Highways** 101, 87, 880, 280, 17  
**Airports** NYMSJ International Airport  
**Railways** SPRR  
**Waterways** Coyote and Guadalupe Rivers  
**Schools** San Jose Unified and Santa Clara Unified  
**Land Use** Airport, Commercial and Industrial Park Uses, and public street right-of-way / Zoning: HI-Heavy Industrial, CP Commercial Pedestrian, IP Industrial Park, A (PD) Industrial Park and Hotel uses / General Plan: Public/Quasi-Public, Industrial Park and Industrial Park w/Preferred Hotel Site

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**Project Issues** Air Quality; Flood Plain/Flooding; Geologic/Seismic; Noise; Forest Land/Fire Hazard; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Growth Inducing; Landuse

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Air Resources Board, Airport Projects; Regional Water Quality Control Board, Region 2; Department of Water Resources; Caltrans, Division of Aeronautics; Department of Health Services; Caltrans, District 4; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

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**Date Received** 10/11/2002 **Start of Review** 10/11/2002 **End of Review** 11/25/2002

**RESPONSES TO COMMENT #1:**  
**STATE CLEARINGHOUSE**

The letter from the State Clearinghouse summarizes the review of the Draft Supplemental EIR by various State agencies. No response is required.



Winston H. Hickox  
Secretary for  
Environmental  
Protection

# California Regional Water Quality Control Board

## San Francisco Bay Region

Section 2 - Responses to Comments



Gray Davis  
Governor

Internet Address: <http://www.swrcb.ca.gov>  
1515 Clay Street, Suite 1400, Oakland, California 94612  
Phone (510) 622-2309 FAX (510) 622-2460

RECEIVED  
NOV 01 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT

Date: OCT 29 2002  
File No. 2188.05 (BKW)

COMMENT  
#2

Janis Moore  
Department of Planning, Building & Code Enforcement  
City of San Jose  
801 North First Street, Room 400  
San Jose, CA 95110-1795

Re: **Draft Supplemental Environmental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update (File No. PP02-08-226; SCH # 1995073066)**

Dear Ms. Moore:

Regional Water Quality Control Board (Regional Board) staff have reviewed the *Draft Supplemental Environmental Impact Report (EIR) for the Norman Y. Mineta San Jose International Airport Master Plan Update*. The EIR evaluates a proposed update of the Master Plan to allow the construction of an Off-Airport Elevated Automated People Mover (APM). Regional Board staff have the following comments on the EIR.

### Comment 1

#### Section 1.6. Uses of the EIR and Permits Required

This section should be revised to include the role of the Regional Board in issuing a waiver of Waste Discharge Requirements for construction of the supporting column of the APM that will be located within the banks of the Guadalupe River. The column appears to be planned for a location that is above the ordinary high water mark and, therefore, outside of Army Corps of Engineers (ACOE) jurisdiction. However, activities in areas that are outside of the jurisdiction of the Corps (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high water mark) are regulated by the Regional Board, under the authority of the Porter-Cologne Water Quality Control Act. Activities within the banks of the Guadalupe River that lie outside of ACOE jurisdiction will require the issuance, or waiver, of Waste Discharge Requirements from the Regional Board. If the column is located below the ordinary high water mark and an ACOE permit is required, this permit will only be valid after being certified by the Regional Board, under Section 401 of the Clean Water Act.

A

- 2 -

**Comment 2**

***Page B-20, September 9, 2002, Comments from the Santa Clara Valley Water District (File 22275) on the Notice of Preparation of a Supplemental Draft Environmental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update***

Regional Board staff agree with the Santa Clara Valley Water District request that consideration be given to an alignment closer to the existing bridge to minimize impacts on the riparian corridor. The City of San Jose's response to comment G-2 states that an alignment closer to the Skyport Drive bridge was evaluated and found to be problematic in terms of being able to tie into the planned terminal and parking facilities at the Airport. Based on the information provided in the EIR, re-alignment of the proposed APM closer to the existing bridge does not present insurmountable barriers. Please provide a thorough evaluation of the difficulties associated with an APM alignment closer to the existing bridge.

If you have any questions, please contact Brian Wines at (510) 622-5680 or e-mail [bkw@rb2.swrcb.ca.gov](mailto:bkw@rb2.swrcb.ca.gov).

Sincerely,



Brian Wines  
Water Resources Control Engineer  
Alameda-Santa Clara Watershed Section

cc: State Clearinghouse, Attn: Katie Shulte Joung, P.O. Box 3044, Sacramento, CA 95812-3044  
USACE, San Francisco District, Attn: Regulatory Branch, 333 Market Street, San Francisco, CA 94105 -2197  
Santa Clara Valley Water Control District, Attn: Sue Tippetts, Community Projects Review Unit 5750 Almaden Expressway, San Jose, Ca 95118-3686  
CDFG, Central Coast Region, Attn: Robert Floerke, Regional Manager, P.O. Box 47, Yountville CA 94599

**RESPONSES TO COMMENT #2:**  
**REGIONAL WATER QUALITY CONTROL BOARD**

**RESPONSE TO COMMENT 2-A**

The City will obtain all required permits in accordance with both state and federal law.

**RESPONSE TO COMMENT 2-B**

There is very little room to move the APM alignment horizontally due to the presence of structures on both sides of the Guadalupe River. As shown on Figure 4 of the Draft SEIR, moving the alignment closer to the Skyport Drive bridge would impact the Marriott Hotel on the east side of the River and the passenger terminal facilities on the west side of the River.

Even if it were feasible to move the alignment closer to the Skyport Drive bridge, the City does not believe that the impacts on the Guadalupe River ecosystem would be less than under the proposed alignment. This statement is based on the fact that the project has been carefully designed to avoid the removal of riparian vegetation, either permanently or temporarily.

## DEPARTMENT OF TRANSPORTATION

P. O. BOX 23660  
OAKLAND, CA 94623-0660  
(510) 286-4444  
(510) 286-4454 TDD



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CITY OF SAN JOSE  
PLANNING DEPARTMENT  
FAX REC'D. 11/20/02

November 20, 2002

COMMENT  
#3

SCL-87-8.76  
SCL087081  
SCH1995073066

Ms. Janis Moore  
City of San Jose  
Department of Planning, Building and Code Enforcement  
801 North First Street, Room 400  
San Jose, CA 95110-1795

Dear Ms. Moore:

Norman Y. Mineta San Jose International Airport Master Plan Update - Draft Supplemental Environmental Impact Report (DSEIR)

Thank you for continuing to include the California Department of Transportation in the environmental review process for the proposed project. We have reviewed the DSEIR and have the following comments to offer:

1. Page 18 of Appendix C indicates that a single growth factor was used for each approach direction at all intersections because of the inherent coarseness of the regional models. A comparison of this single growth factor with the Metropolitan Transportation Commission (MTC) model for these segments shows that these growth factors are conservative, hence the growth rate applied is acceptable. A
2. Due to the unique character of the proposed project type, the Institute of Transportation Engineers (ITE) Trip Generation Manual does not have trip generation rates for this type of land use. However, page 19 of Appendix C indicates that the Automated People Mover (APM) peak passenger rates were calculated by Dowling Associates based on ridership volumes and travel times. Accordingly, peak hour trips were reported on the same page as 66 total pick-up and drop-off vehicles. However, no supporting documentation for this estimation was provided. Please provide this supporting documentation for our review. B
3. There is a possibility that the soil adjacent to State Route 87 (SR 87) may contain lead that has been aurally deposited onto the soil from vehicles. We suggest soil sampling and lead testing during the design phase to determine if there is any soil contamination due to Aerially Deposited Lead (ADL). C
4. Since the scope of the proposed project requires an encroachment permit for work in Caltrans right-of-way (ROW), the contractor shall address the temporary water quality impacts during construction, and post-construction. To comply with the conditions of the Caltrans National Pollutant Discharge Elimination System (NPDES) Permit, and address the temporary water quality impacts resulting from the construction activities in this project, the contractor shall include and implement a Storm Water Pollution Prevention Plan (SWPPP) during construction. D

*"Caltrans improves mobility across California"*

Ms. Janis Moore/ City of San Jose  
November 20, 2002  
Page 2

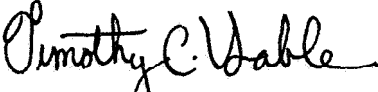
5. Design of the APM over SR 87 should be completed in such a way that it will not prevent Caltrans from widening or making improvements to the freeway in the future.
6. A "Joint Use" agreement will be required prior to any construction activities or encroachment permits being issued for work within State ROW. The "Joint Use" agreement will define responsibilities for removal and relocation of the APM facility within the SR 87 ROW should future conflicts occur between the APM and future freeway expansion, including all ramps and other elements associated with the freeway.
7. The portions of the APM within the SR 87 ROW shall meet all Caltrans standards and policies. Of particular concern are issues related to all permanent and/or temporary vertical and/or horizontal clearances, including false work clearances. The location and number of APM support columns within the freeway ROW should be limited to one column within the freeway median, if required. The preference would be to clear span the freeway ROW. If a column is placed in the freeway median the horizontal clearance to the traveled way shall be maximized to the greatest extent possible.
8. All APM construction activities within SR 87 ROW and lane closures shall be in accordance with current Caltrans policy and procedures, and Caltrans shall be provided lane closure charts.
9. As indicated on page 21 of the DSEIR, an encroachment permit will be required for any work or traffic control within State ROW. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans (in metric units), clearly indicating State ROW, need to be submitted to the following address:

Mr. Sean Nozzari, District Office Chief  
Office of Permits  
California Department of Transportation, District 04  
P. O. Box 23660  
Oakland, Ca 94623-0660

In addition, if the cost to build the APM within State ROW exceeds one million dollars, the City would be required to execute a cooperative agreement with Caltrans.

We look forward to receiving a response to our comments at least ten days prior to certification of the EIR pursuant to Section 21092.5(a) of the California Environmental Quality Act (CEQA). Should you require further information or have any questions regarding this letter, please call Maija Cottle, of my staff at (510) 286-5737.

Sincerely,



TIMOTHY C. SABLE  
District Branch Chief  
IGR/CEQA

c: Gregoria Garcia (State Clearinghouse)



**RESPONSES TO COMMENT #3:**  
**CALTRANS**

**RESPONSE TO COMMENT 3-A**

This comment concurs with the growth factor used in the traffic analysis. No response is required.

**RESPONSE TO COMMENT 3-B**

This information (i.e., the Dowling Associates APM Ridership Report) was mailed to Caltrans, as requested.

**RESPONSE TO COMMENT 3-C**

As standard procedure, the City will test soils for the presence of hazardous materials, including lead.

**RESPONSE TO COMMENT 3-D**

Agreed. A SWPPP will be prepared for the entire project, including any work within the Caltrans right-of-way.

**RESPONSE TO COMMENT 3-E**

APM staff and consultants have been meeting with Caltrans staff on a regular basis to ensure compatibility between the APM and the Route 87 project. The City will continue to work with Caltrans for the purpose of meeting requirements for work within the Caltrans right-of-way. Where required, encroachment permit(s) will be obtained.

**County of Santa Clara**

Roads and Airports Department

101 Skyport Drive  
San Jose, California 95110-1302

Section 2 - Responses to Comments

**RECEIVED**  
OCT 22 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT



October 18, 2002

Ms. Janis Moore  
Department of Planning, Building,  
and Code Enforcement  
City of San Jose  
801 North First Street, Room 400  
San Jose, CA 95110 - 4576

**COMMENT  
#4**

Subject: Draft Supplemental Environmental Impact Report (DSEIR)  
for Norman Y. Mineta San Jose International Airport  
Master Plan Update  
File No.: PP02-08-226  
[State Clearinghouse # 1995073066]

Dear Ms. Moore,

We have reviewed the DSEIR attached to your letter dated October 2, 2002. Our comment is as follows regarding the future Automated People Mover (APM) extensions:

- De La Cruz Boulevard (between Central Expressway and US 101 southbound on ramp) may need additional right-of-way to provide a better connection to Central Expressway and also to improve bicycle access on eastbound De La Cruz Boulevard.

If you have any questions, please call me at (408) 573-2450.

Sincerely,

Carmelo Peralta  
Project Engineer

Cc: DEC, MA, RVE, File

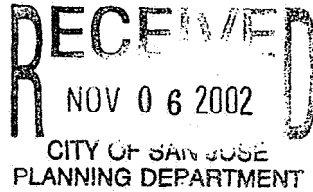
**RESPONSES TO COMMENT #4:**  
**SANTA CLARA COUNTY ROADS AND AIRPORTS DEPARTMENT**

This comment addresses a potential right-of-way/design issue associated with a future APM extension from the Airport to a planned BART station. That future extension will be subject to additional environmental review once one or more alignments have been selected for analysis, and such extension is outside the scope of this EIR.

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October 31, 2002



COMMENT  
#5

Janis Moore  
Department of Planning, Building and Code Enforcement  
801 N. First Street, Room 400  
San Jose, CA 95110-1795

Subject: Draft Supplemental Environmental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update, File # PP02-08-226

Dear Ms. Moore:

The Planning Division has received a copy of the Draft Supplemental Environmental Impact Report (DSEIR) for the above referenced project file. As stated in the DSEIR, the project involves modification of the San Jose International Airport Master Plan to allow construction of an elevated automated people mover (APM), between the airport and the North First Street light rail transit station. The following information is provided in response to your request for comments related to environmental effects of the proposed project and the adequacy of the DSEIR:

- The DSEIR discusses the BART extension to Santa Clara County and the terminus of the alignment adjacent to the existing Santa Clara Caltrain Station. In conjunction with the San Jose City Council, VTA and BART Board of Directors, the Santa Clara City Council has also endorsed an APM connection between the existing Caltrain station, future BART station and San Jose Airport. A
- The APM connection is not part of the BART extension project cited above for which environmental analysis and preparation of an EIR/EIS is currently underway. The project description in the DSEIR for the San Jose Airport Master Plan Update implies that the APM extension to Caltrain and BART is incorporated into the EIR/EIS process for the BART extension project. Subsequent environmental analysis will be required with the adoption of the APM extension to Caltrain and BART when identified as a project and when a project description and funding is identified. B
- The project description for the DSEIR specifies the two route alignment options under examination to connect the Airport APM to the BART and Caltrain stations. The discussion regarding route alignment should include information related to integration and connectivity of design between the APM connecting the Airport to the North First Street Light Rail Station and the Airport to BART and Caltrain facilities, as part of the project description. C

The City looks forward to the opportunity to review the Final Supplemental EIR for this project. Should you have questions or require additional information, please contact me at 408-615-2450.

Sincerely,

Arthur Henriques  
City Planner

I:\PLANNING\ENVIRON\SJ Airport People Mover DSEIR.doc

**RESPONSES TO COMMENT #5:**  
**CITY OF SANTA CLARA**

**RESPONSE TO COMMENT 5-A**

The City of Santa Clara's support for an APM connection between the Airport and the BART/Caltrain station is noted for the record.

**RESPONSE TO COMMENT 5-B**

This comment is correct. The APM connection between the Airport and the BART/Caltrain station is not part of the EIS/EIR for the BART Extension Project. Separate environmental clearance will be required for the APM connection between the Airport and the BART/Caltrain station.

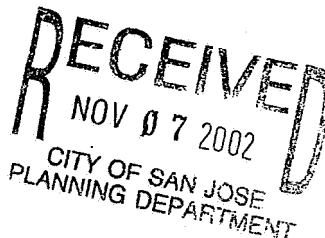
**RESPONSE TO COMMENT 5-C**

The description of a future APM connection between the Airport and the BART/Caltrain station is only conceptual, since one or more alignments have not been selected for analysis. The information has been included in the SEIR to provide a general overview as to how the APM, LRT, BART, and Caltrain systems will eventually interface and tie together. The City agrees that all of these projects should be designed so as to maximize convenient and efficient transfer of passengers from one transit mode to another.



November 4, 2002

COMMENT  
# 6



Ms. Janis Moore  
City of San Jose  
Department of Planning, Building and Code Enforcement  
801 North First Street, Room 400  
San Jose, CA 95110-1795

**Re: City of San Jose File No. PP02-08-226: Draft Supplemental Environmental Impact Report for the San Jose International Airport Master Plan Update (SCH#1999073066).**

Dear Ms. Moore:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (DSEIR) for the above-referenced project. A portion of the project site lies within the Airport Land Use Commission's (ALUC) referral boundary for San Jose International Airport and is subject to the land use policies as defined in the ALUC *Land Use Plan for Areas Surrounding Santa Clara County Airports*.

#### *Noise Impacts*

In its response to ALUC comments on the Notice of Preparation, the City incorrectly states that the ALUC has no noise policies that are applicable to the proposed project. Policy N-1 in the *Land Use Plan* states "the Community Noise Equivalent Level (CNEL) method for measuring noise impacts near airports shall be used for general guidance in determining suitability for various types of land uses." A portion of the project site lies within the 65 CNEL noise contour boundary for San Jose International Airport under all analyzed scenarios in Section 2.2.2 of the DSEIR.

According to *Table 1: Land Use Compatibility Chart for Aircraft Noise in the Vicinity of San Jose International Airport*, land uses related to airport service are considered acceptable up to a noise contour of 85 and no noise mitigation components are required. In addition, the project would not be subject to a Single Event Noise Exposure Level (SENEL) analysis since noise reduction components are not required for the proposed airport service land use. Therefore, the proposed project would be consistent with ALUC noise policies as stated in the *Land Use Plan*.

#### *Safety/Height Impacts*

The project site lies outside the safety zones for San Jose International Airport and is not subject to ALUC safety zone policies as defined for this airport.

Section 2.4.2 of the DSEIR states that the project will not violate any FAA height restrictions associated with San Jose International Airport. The DSEIR should have included the basis for this determination, including the applicable Part 77 imaginary surfaces above the project location as well as a discussion of any

related height restrictions as established by the FAA. The Final SEIR should include the FAA's formal response to this project, along with any applicable clearances.

*Determination of ALUC Consistency with State Law*

In response to ALUC comments regarding the Notice of Preparation, the City noted that the ALUC *Land Use Plan* had not been updated to reflect the Airport Master Plan as required by State law. ALUC staff notes that the *Land Use Plan* is currently being updated, and reminds the City that it should refrain from making unsolicited comments pertaining to the requirements of State law.

ALUC staff requests a copy, when available, of the Final SEIR for review and comment. If you have any questions, please call me at (408) 299-5785.

Sincerely,



Derek Farmer  
ALUC Staff Coordinator

cc: Cary Greene, San Jose International Airport

**RESPONSES TO COMMENT #6:**

**SANTA CLARA COUNTY AIRPORTS LAND USE COMMISSION**

**RESPONSE TO COMMENT 6-A**

This clarification is noted. ALUC's determination that the proposed APM would be consistent with ALUC noise policies is also noted.

**RESPONSE TO COMMENT 6-B**

The determination was made by comparing the transmission tower heights to the Part 77 heights for the applicable locations. Formal FAA concurrence will be obtained when the tower heights are finalized by PG&E.

**RESPONSE TO COMMENT 6-C**

Comment noted.





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NOV 22 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT  
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5750 ALMADEN EXPWY  
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www.valleywater.org  
AN EQUAL OPPORTUNITY EMPLOYER

File: 22275  
Guadalupe River

November 20, 2002

COMMENT  
# 7

Ms. Janis Moore  
City of San Jose  
City Hall Annex, Room 400  
801 North First Street  
San Jose, CA 95110-1795

Subject: Draft Supplemental Environmental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update

Dear Ms. Moore:

The Santa Clara Valley Water District (District) has reviewed the Draft Supplemental Environmental Impact Report (EIR) for the Norman Y. Mineta San Jose International Airport Master Plan Update, dated October 2002 and submitted to the District on October 10, 2002.

The document indicates that two Pacific Gas & Electric towers along Airport Boulevard will need to be raised to provide adequate clearance to the automated people mover (APM). This work will also require a District permit as they are adjacent to the river and possibly on District easement. ] A

Future APM extensions including a connection to the Green Island and a Bart/Caltrain extension (aboveground option) are referred to in the document. Both of these future extensions require additional crossings of the Guadalupe River. Future APM crossings of the Guadalupe River should be minimized and when necessary should be located as close as possible to existing bridges to avoid additional impacts to the Guadalupe River. Each crossing impacts the riparian habitat and breaks up the corridor into smaller pieces which reduces the quality of the habitat. Any proposed crossing that affects designated District mitigation sites must be replaced in kind. ] B

Page 73 of the document states that the easterly column over the Guadalupe River will be located immediately adjacent to the retaining wall along Highway 87. The plans provided to the District by the City show the column located approximately 15' west of the wall at the top of bank/edge of the District maintenance road. The document should clarify the location of this column. Also as discussed with the City, the plans should be modified to allow for an 18' maintenance road on the west bank and on the east bank the City will investigate moving the column closer to the river to allow for an 18' maintenance road. ] C

Based on the plans provided by the City, construction of the easterly column will require the removal and replacement of gabion and rock slope protection approximately 30' in length and approximately 23' high along the bank. Please note that although this work may not substantially impact the river, it is within the banks and may require Department of Fish and Game and Regional Water Quality Control Board permits since the work is within the channel. ] D

The mission of the Santa Clara Valley Water District is a healthy, safe and enhanced quality of living in Santa Clara County through the comprehensive management of water resources in a practical, cost-effective and environmentally sensitive manner.



Ms. Janis Moore  
Page 2  
November 20, 2002

Also, at the time of construction some riparian vegetation may have become established within the rock and gabion slope protection. If vegetation does become established within the slope protection there would be at least a temporary loss of this vegetation which is not addressed in the document. The document states that no riparian vegetation will be removed as part of this project.

Lastly, it is not clear how impacts to the riparian corridor will be mitigated by conducting a one time trash/debris clean up of the river for a distance of 1 mile upstream of the APM. The District already has two programs to address the issue of trash/debris removal within creeks—our Good Neighbor Trash Clean-Up Program and the Adopt-a-Creek program. Flood control improvements are scheduled for completion in the area about the same time construction of the APM is scheduled to begin and various mitigation plantings are located in the area, so the state of the river at the time of this project may be good in regards to trash/debris due to other cleanup activities, maintenance of mitigation plantings, and general cleanup of the area upon completion of the flood control work.

Please submit a copy of the final supplemental EIR to the District for our review and comment when available. Reference District File No. 22275 on further correspondence regarding this project.

If you have any questions or need further information, you can reach me at (408) 265-2607, extension 2322.

Sincerely,



Colleen Haggerty  
Assistant Engineer  
Community Projects Review Unit

cc: S. Tippets, V. Stephens, D. Chesterman, S. Hosseini, C. Haggerty, File (2)  
ch:fd  
1120a-pl.doc

**RESPONSES TO COMMENT #7:**  
**SANTA CLARA VALLEY WATER DISTRICT**

**RESPONSE TO COMMENT 7-A**

A permit will be obtained for work within SCVWD jurisdiction.

**RESPONSE TO COMMENT 7-B**

The City agrees that impacts to the Guadalupe River should be avoided or minimized to the greatest extent practicable. This philosophy is evidenced by the design of the proposed APM crossing wherein no riparian vegetation will be removed.

**RESPONSE TO COMMENT 7-C**

The City will continue to work with the SCVWD with regard to the locations of the columns. However, per the previous comment and response, the City's goal is to place the columns such that impacts to riparian vegetation do not occur.

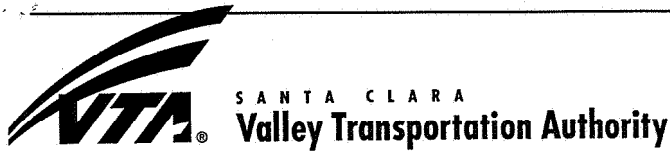
**RESPONSE TO COMMENT 7-D**

The City understands that this work will require a Streambed Alteration Agreement with the CDFG. Section 401 Water Quality Certification will not be required from the RWQCB unless a Section 404 permit is needed from the Army Corps of Engineers. At this time, no Corps permit is anticipated to be required because the proposed design avoids works within Corps' jurisdiction.

The issue of potential vegetation within the rocks or gabions was not addressed in the SEIR because it does not currently exist and its future existence is speculative.

**RESPONSE TO COMMENT 7-E**

Given the nature of the project's impacts (see description on pages 64-65 of the Draft SEIR), biologists determined that this type of mitigation would be appropriate. The reasoning behind this determination is set forth on page 67 of the Draft SEIR. The City will coordinate with the SCVWD to identify a 1-mile stretch of the Guadalupe River has a greater need for a one-time cleanup.



RECEIVED  
NOV 22 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT

FAX REC'D 11/21/02

COMMENT  
# 8

November 21, 2002

City of San Jose  
Department of Planning and Building  
801 North First Street  
San Jose, CA 95110

Attention: Janis Moore

Subject: City File No. SCH1995073066 / San Jose International Airport Master Plan Draft  
SEIR (Revised)

Dear Ms. Moore:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the Draft Supplemental EIR (SEIR) to address modification to the Master Plan to allow an Off-Airport Automated People Mover (APM) at the San Jose International Airport. VTA strongly supports this important transit connection which is included in VTA's Valley Transportation Plan (VTP 2020). We have the following specific comments on the Draft SEIR. A

Coordination with VTA

VTA staff have been participating in the City's planning effort for the APM connection to the Guadalupe Light Rail Line on North First Street. We are pleased that the project description incorporates VTA input, including the relocation of the northbound Metro LRT station platform and a dual guideway APM system to connect with our LRT system. B

Pedestrian Circulation

Users of the North First Street APM Station will access the station from the relocated northbound LRT platform; therefore, pedestrian circulation between the northbound and southbound LRT platforms will need careful consideration to ensure efficient, safe, and convenient transfers. The pedestrian circulation plan should be outlined in general terms in the FEIR. C

City of San Jose  
November 21, 2002  
Page 2

Bicycle Parking

The SEIR states that the City has not determined whether bicycle lockers will be provided in or adjacent to the Airport Terminals. Due to security risks, VTA staff suggests that, if long term bicycle parking for employees is not currently provided, instead of bicycle lockers, an open area of restricted access with bicycle access be provided in or near the Airport Terminals or parking garages. This could be an open, chain link fence surrounding the area to provide optimal visibility and reduced security risks, as well as security from potential thieves. Employees commuting by bike could have access via a code or key lock.

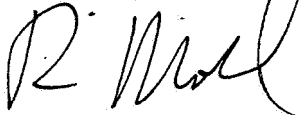
Impacts to Transit Service

The Draft SEIR indicates that the project will retain the existing number of bus stops/duckouts that are currently operating at the existing Metro Station served by the Airport Flyer. We assume this also includes other existing bus stop amenities such as shelters.

We appreciate the "traffic and circulation" discussion regarding impacts to bus and light rail operations as a result of the project, as we requested in our response to the NOP. Please add a general discussion of construction impacts on bus and light rail impacts, including, for example, the anticipated duration of construction.

Thank you for the opportunity to review this project. If you have any questions, please call me at (408) 321-5784.

Sincerely,



Roy Molseed  
Senior Environmental Planner

RM:kh

cc: Ebrahim Sohrabi, San Jose Public Works Department  
Julie Render, VTA  
Samantha Swan, VTA

**RESPONSES TO COMMENT #8:**  
**SANTA CLARA VALLEY TRANSPORTATION AUTHORITY**

**RESPONSE TO COMMENT 8-A**

VTa's support for the proposed APM project is noted for the record.

**RESPONSE TO COMMENT 8-B**

The City's intent is to have an APM design that is integrated with, and works well with, the LRT. To this end, the City will continue its close coordination with VTA as the project's planning and design processes proceed.

**RESPONSE TO COMMENT 8-C**

Pedestrian circulation is outlined on pages 26-27 of the traffic report (Appendix C of the SEIR). The City agrees with this comment that safe and efficient pedestrian circulation is necessary. The City will continue to work with VTA on this issue.

**RESPONSE TO COMMENT 8-D**

This suggestion will be considered as the designs for the garages and Centralized Terminal proceed.

**RESPONSE TO COMMENT 8-E**

This assumption is correct.

**RESPONSE TO COMMENT 8-F**

Plans for construction phasing and staging on North First Street are not yet developed. However, the City recognizes the importance of minimizing any impacts to LRT and/or bus operations during construction. All APM construction plans for the North First Street area will be coordinated with VTA staff for the purpose of receiving input on minimizing such impacts to the greatest degree practicable.



**Pacific Gas and  
Electric Company**

Land Rights Office

111 Almaden Boulevard, Room 814  
P.O. Box 15005  
San Jose, CA 95115-0005

Land Services

COMMENT  
#9

November 14, 2002

Dept. of Planning, Building and Code Enforcement  
City of San Jose, City Hall Annex, Rm. 400  
801 North First St.  
San Jose, CA 95110  
Attn: Janis Moore

RE: Review of Draft Supplemental Environmental Impact Report  
Norman Y. Mineta San Jose International Airport Master Plan  
Airport Blvd., San Jose  
Date of DSEIR: October 2002  
PG&E File : 40127756-02-MR-124

RECEIVED  
NOV 18 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT

Dear Ms. Moore :

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Report (DSEIR) for the Norman Y. Mineta San Jose International Airport Master Plan at Airport Blvd., San Jose. PG&E has the following comments to offer:

PG&E owns and operates gas and electric facilities which are located within and adjacent to the proposed project. To promote the safe and reliable maintenance and operation of utility facilities, the California Public Utilities Commission (CPUC) has mandated specific clearance requirements between utility facilities and surrounding objects or construction activities. To ensure compliance with these standards, project proponents should coordinate with PG&E early in the development of their project plans. Any proposed development plans should provide for unrestricted utility access and prevent easement encroachments that might impair the safe and reliable maintenance and operation of PG&E's facilities.

The developers will be responsible for the costs associated with the relocation of existing PG&E facilities to accommodate their proposed development. Because facilities relocation's require long lead times and are not always feasible, the developers should be encouraged to consult with PG&E as early in their planning stages as possible.

Relocations of PG&E's electric transmission and substation facilities (50,000 volts and above) could also require formal approval from the California Public Utilities Commission. If required, this approval process could take up to two years to complete. Proponents with development plans which could affect such electric transmission facilities should be referred to PG&E for additional information and assistance in the development of their project schedules.



Dept. of Planning  
November 14, 2002  
Page 2

We would also like to note that continued development consistent with City's General Plans will have a cumulative impact on PG&E's gas and electric systems and may require on-site and off-site additions and improvements to the facilities which supply these services. Because utility facilities are operated as an integrated system, the presence of an existing gas or electric transmission or distribution facility does not necessarily mean the facility has capacity to connect new loads.

Expansion of distribution and transmission lines and related facilities is a necessary consequence of growth and development. In addition to adding new distribution feeders, the range of electric system improvements needed to accommodate growth may include upgrading existing substation and transmission line equipment, expanding existing substations to their ultimate buildout capacity, and building new substations and interconnecting transmission lines. Comparable upgrades or additions needed to accommodate additional load on the gas system could include facilities such as regulator stations, odorizer stations, valve lots, distribution and transmission lines.

We would like to recommend that environmental documents for proposed development projects include adequate evaluation of cumulative impacts to utility systems, the utility facilities needed to serve those developments and any potential environmental issues associated with extending utility service to the proposed project. This will assure the project's compliance with CEQA and reduce potential delays to the project schedule.

We also encourage the Planning Office of the City to include information about the issue of electric and magnetic fields (EMF) in the Notice of Preparation. It is PG&E's policy to share information and educate people about the issue of EMF.

Electric and Magnetic Fields (EMF) exist wherever there is electricity--in appliances, homes, schools and offices, and in power lines. There is no scientific consensus on the actual health effects of EMF exposure, but it is an issue of public concern. If you have questions about EMF, please call your local PG&E office. A package of information which includes materials from the California Department of Health Services and other groups will be sent to you upon your request.





Dept. of Planning  
November 14, 2002  
Page 3

PG&E remains committed to working with City to provide timely, reliable and cost effective gas and electric service to the planned area. We would also appreciate being copied on future correspondence regarding this subject as this project develops.

The California Constitution vests in the California Public Utilities Commission (CPUC) exclusive power and sole authority with respect to the regulation of privately owned or investor owned public utilities such as PG&E. This exclusive power extends to all aspects of the location, design, construction, maintenance and operation of public utility facilities. Nevertheless, the CPUC has provisions for regulated utilities to work closely with local governments and give due consideration to their concerns. PG&E must balance our commitment to provide due consideration to local concerns with our obligation to provide the public with a safe, reliable, cost-effective energy supply in compliance with the rules and tariffs of the CPUC.

Should you require any additional information or have any questions, please call me at (408) 282-7401.

Sincerely,

Alfred Poon  
Land Agent  
South Coast Area, San Jose

**RESPONSES TO COMMENT #9:**  
**PACIFIC GAS AND ELECTRIC COMPANY**

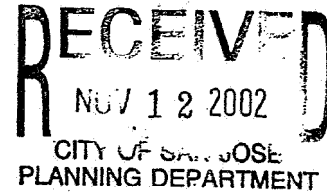
This comment from PG&E does not address the specific impacts of the proposed APM project, but is a form letter provided to the City on various EIRs. The City's responses to the issues raised by PG&E in this letter are as follows:

- >> The City is aware that the project may require the relocation of electric and/or gas lines that are owned by PG&E. The City understands that the project is responsible for the costs associated with any relocation that is necessitated by the project.
- >> Information regarding EMF is provided in EIRs when applicable, such as when housing is being proposed near high voltage transmission lines and/or a transmission line is proposed to be relocated.
- >> The network of transmission lines and substations that carry electricity for distribution to customers is planned for and regulated by the California Public Utilities Commission (CPUC), the Independent System Operator (ISO), and the California Energy Commission. Transmission facility owners such as PG&E file annual transmission expansion plans to accommodate the state's growing electricity needs with the ISO. The CPUC is the Lead Agency that evaluates new major utility features for both electricity and natural gas. While it is appropriate to address any new infrastructure needed for this specific project, system-wide or regional improvements are beyond the scope of this SEIR.



CHAMBER OF  
COMMERCE

COMMENT  
# 10



November 6, 2002

Janis Moore  
Department of Planning, Building & Code Enforcement  
801 N. First St., Room 400  
San Jose, CA 95110-1795

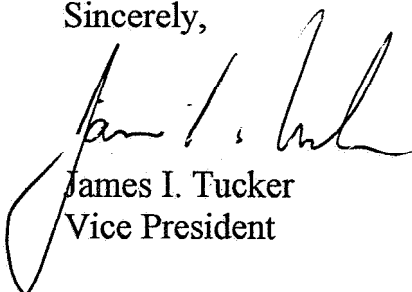
RE: Draft SEIR for SJC Master Plan Update (File No. PP02-08-226)

Thank you for the opportunity to comment on the Draft Supplemental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update. In our view, the document appears complete.

We appreciate the thorough review of potential impacts as well as the careful and extensive listing of mitigations. In addition, we acknowledge the airport's demonstrated willingness to continue monitoring impacts where they are not known at this time.

Once again, we applaud the City of San Jose and its airport for efforts to provide a first class aviation facility that also will be a good neighbor to the surrounding community.

Sincerely,



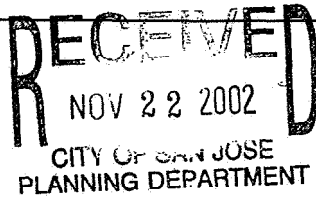
James I. Tucker  
Vice President

Cc: Jim Webb  
Ralph Tonseth  
Jim Cunneen

**RESPONSES TO COMMENT #10:**

**SAN JOSE SILICON VALLEY CHAMBER OF COMMERCE**

The San Jose/Silicon Valley Chamber of Commerce's support for the proposed APM project is noted for the record.



November 19, 2002  
1274 San Juan Ave.  
San Jose, CA 95110

COMMENT  
# 11

Ms. Janis Moore  
City of San Jose  
801 North First Street  
San Jose, CA 95110-1795

RE: Draft Supplemental Environmental Impact Report on SJC Airport Master Plan

Dear Ms. Moore:

Thank you for the opportunity to review the Supplemental EIR on the Airport Master Plan. The SJC Airport generally significantly impacts my family and community because we live in Rosemary Gardens neighborhood. I appreciate the opportunity to provide public input in an attempt to understand the EIR and possible necessary mitigations.

Construction of Off-Airport Automated People Mover:

I am supportive of the construction of the APM however I am concerned with traffic and parking impacts on my neighborhood and would like to make sure that all possible mitigations have been explored.

My husband works near the proposed APM station. Parking in this area was almost filled to capacity during the height of the Dot Com boom. The EIR states that occupancy surveys of the on-street parking were not performed, however, "suggests" that parking in the immediate vicinity has high occupancy rates (i.e. not available) and parking farther from the station (i.e. over 10 minutes walk) has considerably lower occupancy (including my neighborhood). Occupancy surveys were conducted for the off-street parking which appears to demonstrate available parking for the offices in the area. When was this survey done? What was the office vacancy rate in the area, as of the date of the survey? What are the projections for office vacancy rate in the future and how does this impact the need for APM and other visitor parking in the area.

Is it appropriate to consider restricted off-street parking as an option for APM riders? I was surprised to find the following statement in the report. "Likewise, the adjacent off-street spaces could be used unless some type of physical restriction, such as a gate arm activated by a card key, or signage restricting use prevented this from occurring". Do I understand that it is being suggested that private parking lots are to be used for APM riders and then once the lots become full, the City is suggesting that private owners put up some kind of barrier? Isn't that counterproductive?

Is it general City policy to include the on-street parking in residential neighborhoods, such as Rosemary Gardens, as available for APM riders? Rosemary Gardens is already very sensitive to parking issues impacted by restaurants and apartments. Counting

neighborhood and private parking areas as available parking spaces and providing no alternatives will frustrate by residents and local businesses. More restricted parking will then be developed and discourage the use of the APM because of the lack of parking. What other public works projects have included the use of neighborhoods and private lots for parking?

D

The original plan is based on the concept that the majority of APM riders are Light Rail users; however there must be an alternative for parking provided. Employees and others might prefer to park in the area of the APM station to get free parking. Does SJC provide free off-site parking to their employees? Are there any other airports, which provide off-site parking at a free or reduced rate for their employees? Please provide the comparative analysis from other APM facilities and how they solved their parking problem. To reduce the impact to the area community, as well as reduce traffic due to drop offs, it appears that an appropriate mitigation would be to find a parking lot for employees at another location or getting permission to utilize a portion of a parking garage/lot on underutilized properties, such as near 4<sup>th</sup> Street. What areas have been investigated and why were they ruled out. How was the decision made to charge the no fare for the APM? Perhaps charging a small fare, except for light rail users, would encourage the use of Light Rail and therefore provide some mitigation to the parking and traffic impacts. How has this been evaluated?

E

The EIR states that the projected demand for short-term parking at the APM is 7 spaces, with the plan providing 18-22 spaces. How was this projection of 7 cars made? Was any modeling done? I couldn't find any discussion of this issue in the report. What are drop-off facilities and short-term parking like at APMs in other similar metropolitan areas, i.e. Detroit, Chicago, Jacksonville, and Newark? How have they solved this problem?

F

The EIR states that the project will not result in any significant impacts at intersections in the vicinity of the APM/LTR station on North First Street. With the reduction of jobs in Silicon Valley, there has been a great decrease in the amount of traffic on North First Street. The traffic flow is generally much smoother today than it was one year ago. What was the time period in which the "Existing" LOS was based? How are these figures affected by the current economic slump? How are the intersection projections for 2010 with project and 2010 background estimated? Are they based on full occupancy of all current and future development? Do the projections take into consideration the crosswalk and traffic signal that will be installed at Century Center Court? Would a designated parking garage providing drop off facilities, not directly on North First Street, improve the projected LOS in that area?

G

#### Update of Airport Master Plan Noise Impacts

Being that the noise consultants used methodology and assumptions that were so inaccurate that there is an 86% increase in the 65 dB CNEL, why did the City use the same consultants, rather than find a more independent party who has no interest in justifying their prior projections.

H

If the forecasted aircraft fleet mix, "a major factor in projecting noise levels" was different than that which was assumed for the previous EIR noise analysis AND the

I

assumption that the phasing out of Stage 2 jets would reduce noise levels significantly was incorrect, why wasn't a complete noise re-analysis done including a single event noise exposure analysis? What is the basis that the decision was made that this data is still considered accurate? Why is this Update of Noise Impacts just treated as a portion of the EIR for the Automated People Mover?

I

The updated analysis found that the Master Plan would result in a significant increase in aircraft-related noise levels at various locations. The EIR states that the continued implementation of the ongoing Noise Control Program, (i.e. curfew), and the recently expanded Acoustical Treatment Program will mitigate interior noise levels. However the City recently lost one lawsuit and another lawsuit challenging the curfew has been filed. Many requests for exemptions to the curfew had been recently submitted and denied. The City Counsel has currently instituted a moratorium on exceptions to the curfew. Since these legal challenges to the curfew, have there been any applications to the FAA for a modification of the curfew? City Code Section 25.04.550 states that, "If, for any reason, the curfew is modified, the city shall initiate additional environmental review and reconsider 1997 Master Plan and implementation program." Therefore, since there is concern regarding the enforceability of the curfew program, please complete an analysis of the impact of the noise with and without the curfew.

J

"Existing" scenario documents noise levels at SJC based on a one-year period ending March 31, 2002. Since this includes the time period of significantly reduced flights, as well as a number of days of no flights in September 2001, was there any adjustment made to these calculations? These figures should be recalculated based on a one year time period with more normal flight patterns.

K

The unanticipated increase in the size of the SJC noise contours means that several residential neighborhoods are exposed to significant noise impacts. Due to the increase in the noise exposure contour, in just Rosemary Gardens neighborhood, there has been a **19 times increase** in the number of homes that qualify for Category I Acoustical Treatment Programs. Runway 30R is located very close to Rosemary Gardens. Runway 30L is closer to the center of the airfield and therefore more distant from residential homes. Why not apply to the FAA to make Runway 30L the primary runway and limiting Runway 30R as a back-up when Runway 30L is needed for emergencies or repairs? Please do comparison data to evaluate the noise contours for this alternative.

L

What studies have been conducted to evaluate the impact of temperature profiles, humidity, wind gradients, sound diffraction terrain, buildings, and barriers on noise projections? We particularly are disturbed with amplified airplane noise during cloud covers.

M

Thank you for your consideration.

Sincerely,

*Patti Bossert*  
Patti Bossert

**RESPONSES TO COMMENT #11:**

**PATTI BOSSERT**

**RESPONSE TO COMMENT 11-A**

The commentator's support for the proposed APM project is noted for the record. Detailed responses to questions regarding traffic and parking are provided in the following responses.

**RESPONSE TO COMMENT 11-B**

Parking surveys were conducted in 2002. It is unknown as to what the office vacancy rate was at the time of the surveys.

The office vacancy rate would not affect the findings regarding potential parking impacts in the Rosemary Gardens Neighborhood. Rosemary Gardens is 12-20+ minutes walking distance to the proposed APM station on North First Street (SEIR, Figure 9). The potential for APM patrons to park in that neighborhood was analyzed and determined to be unlikely (SEIR, page 32).

**RESPONSE TO COMMENT 11-C**

The City is *not* suggesting that private, off-street parking lots be used by APM patrons. The purpose of including the language referenced in this comment is to assure the owners of such lots that the City will work with them to address any problems associated with their usage by APM patrons, *if* such problems were ever to materialize.

**RESPONSE TO COMMENT 11-D**

The City is neither intending nor expecting APM patrons to park in the Rosemary Gardens Neighborhood. The purpose of including the Rosemary Gardens Neighborhood in the parking supply survey was to make sure that any potential for the neighborhood to be used for parking by APM patrons was thoroughly analyzed in the SEIR. The City had received requests for such an analysis from residents of the Rosemary Gardens Neighborhood who attended the various community meetings that were held on the project.



**RESPONSE TO COMMENT 11-E**

The questions raised in this comment are based on the assumption that the APM project is going to create parking problems in the vicinity of the North First Street Station. This assumption is contrary to the findings in the SEIR. In addition to the parking analysis contained in the Draft SEIR, please see the responses to Comment #14 for further discussion of the parking issue.

**RESPONSE TO COMMENT 11-F**

The methodology for projecting the demand for short-term parking is described beginning on page 4 of Appendix C of the Draft SEIR. Projected drop-off rates on North First Street are unique to this location and cannot be compared to other airports. For example, SJC's rates are based on local factors such as proximity to the Airport, availability of on-Airport parking, mode travel time and cost, and trip purpose (e.g., business vs. recreation vs. employee).

**RESPONSE TO COMMENT 11-G**

"Existing" conditions are 2002, as required by CEQA. Existing traffic volumes were increased to arrive at 2010 volumes, taking into account projected growth in the area. Please see the discussion beginning on page 18 of Appendix C of the Draft SEIR for an explanation of this methodology. The methodology used is the same as that employed by all traffic analyses. The benefit of using the City's TRANPLAN model in this analysis is that the model reflects land uses at full occupancy rates. Thus, potential problems associated with underestimating traffic during downturns in the economy can be largely avoided.

Projections of traffic volumes (i.e., demand) are based on land uses. Traffic signals and crosswalks do not affect traffic projections, only traffic operations. The effect of the crosswalk and signal at Century Center Court are reflected in the operations analysis; see page 32 of the Draft SEIR.

A parking facility at a location away from North First Street would not have a notable effect on LOS since the peak-hour component of traffic related to APM drop-offs/pick-ups will be relatively small.

**RESPONSE TO COMMENT 11-H**

The original EIR noise analysis was prepared in accordance with FAA and State of California criteria using FAA's Integrated Noise Model (INM). The validity of the noise analysis was upheld by a Superior Court judge in 1998. Please refer to pages 39-40 of the Draft SEIR for a discussion on why the noise projections are being updated.

#### **RESPONSE TO COMMENT 11-I**

Single-event data is defined as noise associated with a specific flight operation by a specific aircraft type (e.g., a departure by a MD-80). Those data have not changed from that shown in the original EIR. The only thing that has changed is the cumulative (i.e., CNEL) analysis resulting from changes in the aircraft fleet mix and the number of operations by those aircraft.

The *Preface* to the Draft SEIR explains the reasons for the preparation of the SEIR. Under CEQA, the City is required not only to analyze the effects of a proposed change to an approved project (i.e., the APM) in a SEIR, but also to address significant effects that will be substantially more severe than that shown in the original EIR. In this instance, for the reasons explained on pages 39-40 of the Draft SEIR, noise is the environmental impact that has been determined to be substantially greater than that shown in the original EIR.

Under CEQA, the City is obligated to address the substantial increase in noise impacts prior to taking the next discretionary approval under the *Master Plan*, which in this case is the proposed APM. This is the reason the update of the *Master Plan* noise analysis is included in the SEIR.

#### **RESPONSE TO COMMENT 11-J**

Please see the response to Comment #12-F on page 43 for an overview of the lawsuit related to the curfew and the City's intention regarding the curfew. The City has not applied to the FAA for a modification of the curfew.

#### **RESPONSE TO COMMENT 11-K**

CEQA requires that an EIR describe conditions as they exist at the time the EIR is prepared, defined as when the *Notice of Preparation* is circulated. For noise, the existing conditions were defined as the 1-year period ending on March 31, 2002, the latest 1-year period for which noise data were available when the Draft SEIR analysis commenced. No adjustments were made for the several days in September 2001 when no flights occurred.

Interestingly, although not permissible under CEQA, had the City adjusted the existing conditions data to reflect pre-September 11th flight schedules, such an adjustment would overstate existing conditions. An overstatement of existing conditions would, in turn, lower the relative impacts of the *Master Plan* when compared to that shown in Table 12 (page 48) of the Draft SEIR.

**RESPONSE TO COMMENT 11-L**

For a discussion of limiting Runway 30R to "back-up" usage, please see the response to Comment #15-I on page 83.

**RESPONSE TO COMMENT 11-M**

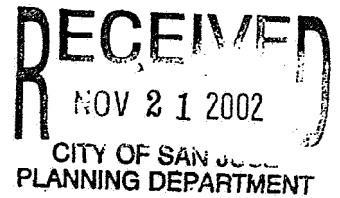
Meteorological conditions are one of the factors taken into account by the FAA's Integrated Noise Model (INM). Local terrain is one of the inputs to the INM, but local terrain is not a factor at SJC. The INM does not calculate acoustical shielding due to buildings or other structures. For example, potential reductions in projected noise in the Rosemary Gardens Neighborhood due to the new elevated Route 87 freeway and soundwalls are not calculated by the INM.

Upon the completion of the Route 87 freeway and soundwalls, additional study of noise will be undertaken in the Rosemary Gardens Neighborhood to determine if there are any Airport-related noise problems (e.g., noise from ground traffic and operations) that were not accounted for with the INM. The supplemental noise study was authorized by the City Council when it approved the updated Noise Exposure Map (NEM) on April 16, 2002.

## CITIZENS AGAINST AIRPORT POLLUTION

### *A League of Neighborhoods*

P.O. Box 26142, San Jose, CA 95159  
408-380-5806 voice/fax or e-mail [info@caap.org](mailto:info@caap.org)



November 20, 2002

COMMENT  
#12

#### STEERING COMMITTEE:

Kenneth Hayes, M.D.  
Chairperson

Walter Bowman, M.D.  
Co-Chairperson

Robert Harmssen  
Vice Chairperson

Lenora Porcella  
Vice Chairperson

Sharen Dains  
Treasurer

Lilian Dennis  
Secretary

Lyle Johnson  
Santa Clara

#### TASK FORCE:

Sandy Bauer  
Webmistress

Patricia Bowman  
Telephone Chair

Ed Hodges  
Historian

Janis Moore  
Department of Planning, Building & Code Enforcement  
801 North First Street, Room 400  
San Jose, CA 95110

Dear Ms. Moore:

Please accept our comments to the Draft Supplemental Environmental Impact Report for the Norman Y. Mineta San Jose International Airport Master Plan Update (File No. PP02-08-226) (SCH #1995073066). We request that these comments be included in the Final SEIR and be considered by the Planning Department at the public hearing.

Comments are divided into three sections:

- Automated People Mover
- Noise Impacts Update
- Related Impacts

Sincerely,

A handwritten signature in cursive script that reads "Kenneth Hayes".

Kenneth Hayes, M. D., Chairman  
Citizens Against Airport Pollution

## AUTOMATED PEOPLE MOVER (APM)

*Unrealistic cost estimate of \$100 million to transport 2500 people daily.*

Where and when will the funding will be obtained? The date of completion is an open question. We recommend that the APM be reevaluated. We believe that Light Rail is a better option, as originally envisioned in Measure O, and should be reconsidered. This would allow airport passengers to take light rail at any point in its system and without a cumbersome baggage transfer, be delivered directly to the airport

A

The cost of the APM should be weighed against the cost of a light rail spur from North First Street to the airport. The likelihood of enhanced ridership on Light Rail should be evaluated.

*Potential Traffic estimates don't go far enough.*

California Environmental Quality Act (CEQA) urges that all reasonable options be explored. There is no estimate, consideration or realistic plan if passengers number 5000, 10,000 or more per day. There is no description of impacts at intersections near the APM station if passenger usage were to double or even quadruple from current estimates.

B

*No estimates are given for parking and transfers if ridership grows beyond estimates to 5,000 or 10,000 per day. Parking for arrivals and departures is inadequate with no provisions for long-term parking.*

B

There is an unrealistic expectation for families with bags to park in the surrounding neighborhood and walk to the APM. Can one envision a family of four searching street by street for parking, then hustling bags and walking to the APM entry? Rosemary Gardens Neighborhood may be required to petition for Permit Parking to protect their neighborhood, further cutting available parking spaces for public use.

C

*Noise barriers are not described in construction of APM.*

To buffer sounds to the neighborhoods, there should be side barriers – effective for noise but ugly to the surrounding neighborhoods.

D

## NOISE IMPACTS UPDATE:

Rodney Slate, former Secretary of the Department of Transportation, said, "Traffic volume at airports is expected to increase and therefore, noise pollution around major airports is expected to increase, despite the introduction of standards to regulate aircraft engine noise." Consultants Brown & Buntin did not heed this warning and predicted noise contours would decrease after the year 2000 with a mandated Stage III commercial fleet. They were wrong.

E

*Unreliability of Brown & Buntin's work (they underestimated acres within the 75 CNEL by 86% in the 1997 Master Plan Update).*

A thorough and comprehensive study should be done to explaining why Brown & Buntin were so wrong in their predictions resulting in the need to redo the noise evaluation around San Jose International Airport. Present predictions for impacted acreage within the 65 CNEL will increase 86% by 2010 and impacted dwellings will increase from 5984 to 7916. Brown & Buntin should

be replaced by a more competent consulting company. Their noise predictions should be redone for others reasons as stated below.

*No evaluation of noise assuming that we do not have an enforceable curfew was done. Need to reserve judgment on noise estimates until the Federal Aviation Administration (FAA) decides how our noise control program will work in the future.*

The San Jose Airport Noise Control Program and its curfew are not enforceable. Cooperation so far has been voluntary. It is no longer hypothetical or speculation to think that changes may be made to our existing NCP. The city, recognizing this, has recently presented proposed modifications to the FAA for comment, some of which may encroach into our nighttime curfew hours. It is possible that the Airport Noise Control Program (NCP) may be set aside and the Wing & A Prayer case remains pending. For this reason, noise contours with and without a curfew must be done. Since CEQA mandates that all reasonable alternatives be explored, not only must we do new noise studies using assumptions with and without an enforceable curfew, but it makes sense to wait until the city has a decision from the FAA regarding proposed modifications or amendments to our NCP.

*No single event noise levels were done.*

Single Event Noise Levels (SENEL) should be restudied. It is inappropriate to refer to a 1997 document, unavailable to many people, and at a time when we now have a second commercial runway in use. Noise has been shifted perceptibly. "Existing" noise levels are those from 3/31/00 to 3/31/02. This includes an artificial bias related to 9/11/01 and the subsequent decrease in air travel. Another time period should be chosen.

*Flight Paths subject to change due to pilot discretion, FAA, or air traffic demands.*

Pilot discretion and potential FAA mandates for alternative flight paths due to air traffic at other Bay Area airports require that alternative flight paths should also be studied.

*No recognition that harmful health effects occur above the 55 CNEL.*

It is stated that outside noise levels within the 65 CNEL are disturbing, significant, and are unmitigatable. It should also be pointed out that at 55 CNEL and above, annoyance with noise increases, sleep is disturbed, and children's studies are interrupted and disturbed. These health and educational effects should be quantified. It should also be noted that noise spikes 8-10 decibels above ambient noise levels are disturbing (Swedish council for building Research).

Speech interference occurs at levels below 75 dBA. Assumptions that houses and closed windows and doors reduce noise levels 25 dBA needs to be substantiated.

*No description of low pitched noise (outside the dBA range) and vibration effect.*

Low pitched noise outside the dBA scale should be studied for its vibration and oscillation effects. These noise levels, unperceived by the human ear, can be disturbing and anxiety producing and may be harmful to wildlife.

*No recognition that helicopter noise is likely to increase.*

An evaluation of helicopter noise must be done. Helicopter noise is likely to increase since the Santa Clara County Sheriff has plans to acquire one. The lowest level of flight, noise contribution and frequency must be determined.

*Property value loss due to aircraft noise intrusion should be studied and quantified.*  
This study also applies to the APM overhead rail, since residences and business' will be underneath its path.

K

## RELATED IMPACTS:

### *Wildlife*

There are no specifics about protection of endangered steelhead trout or Chinook salmon in the Guadalupe River. Consideration should be given to construction during spawning runs, overhead cover, and protection from river spills. Noise impacts will disturb animals and fish due to pile driving and tree removal.

L

### *Vegetation – Removal of trees should be a last resort effort.*

Attempt trimming or topping prior to removal of native trees (Redwood, Monterey Pine).

M

### *Air Quality*

Particulates are derived from burning of diesel and kerosene fuel (trucks and airplanes). The FAA gives no figures for aircraft-responsible particulates. The airport should put air monitors immediately west and east of the airport, and monitor criteria pollutants and carcinogens. If APM usage is 10,000 passengers per day, significant vehicle traffic will be generated. Potential traffic increases and particulates (air quality) and should be studied.

N

### *Water Quality*

There will be short-term effects and these should be quantified. Stream disturbance and dust impacts should be described and mitigated. Describe impacts due to potential fuel dumping and fuel spilling.

O

### *Glossary*

A glossary of terms and abbreviations is necessary

P

### *Table of Contents*

Table of contents and index are necessary

Q

### *Budget, Revenue, Finances*

All actions that affect budgets and revenues should be fully explained and revenue sources outlined.

R

### *Minimums & Maximums*

Any average or median figure should include maximums and minimums, with sources of where they are derived.

S

**RESPONSES TO COMMENT #12:**  
**CITIZENS AGAINST AIRPORT POLLUTION**

**RESPONSE TO COMMENT 12-A**

APM funding sources are still being determined. The commentor's opinion that LRT would be preferable to an APM is noted for the record.

Please see Section 1.3 of the Draft SEIR for a detailed discussion as to how and why the APM was chosen by the City as the preferred rail link between North First Street and the Airport. According to a joint memorandum (11/4/99) to the City Council from the Airport and Public Works Departments, APM technology was recommended over LRT technology for the following nine reasons:

1. The APM is physically smaller than LRT which will allow it to be more easily integrated into the constrained Airport environment.
2. The APM is more cost-effective than LRT with lower capital cost per mile and lower operating cost per year.
3. The APM's smaller size will allow for more stations on the Airport.
4. The APM can handle steeper grades than LRT and is more energy efficient.
5. Extensions of the transit connection APM could be phased more easily than the LRT.
6. The transit connection APM could be a similar system as proposed for the intra-airport APM, so there could be efficiencies of a consistent vehicle fleet, maintenance facilities, and operating requirements.
7. A single operating entity could operate both on- and off-airport systems.
8. The APM would have much greater operational flexibility than the LRT options.
9. APM appears to be perceived by the public as an attractive technology.

The City Council concurred with these recommendations and selected the APM as the preferred technology on December 14, 1999.



**RESPONSE TO COMMENT 12-B**

APM impacts were estimated through the *Master Plan* horizon year of 2010. The City noted that if APM ridership increases beyond that projected in the SEIR, the traffic impacts would primarily be beneficial since there would be fewer cars on the road. This benefit is one of the reasons that community organizations such as CAAP and ATRA have been encouraging the City to improve transit links to the Airport. [Note: Even if the City's projected APM ridership proves low, there is no basis for assuming that the higher demand would notably impact area intersections since additional APM riders would be expected to result primarily from increased use of the LRT.]

**RESPONSE TO COMMENT 12-C**

There is no basis for concluding that "families with bags" will park in existing neighborhoods and walk to the APM. The closest neighborhood, Rosemary Gardens, is 12-20+ minutes walking distance to the proposed APM station on North First Street (SEIR, Figure 9). The potential for APM patrons to park in that neighborhood was analyzed and determined to be unlikely (SEIR, page 32).

Many LRT stations have parking lots, including some parking spaces dedicated for use by Airport passengers and employees. These spaces provide parking for Airport patrons using the LRT, including future transfers from the LRT to the APM.

**RESPONSE TO COMMENT 12-D**

APM-generated noise was quantified in the SEIR in Section 2.2.1. Projected noise levels were determined to be less than applicable standards at all locations. Therefore, no soundwalls are warranted or proposed.

**RESPONSE TO COMMENT 12-E**

The original EIR noise analysis was prepared in accordance with FAA and State of California criteria using FAA's Integrated Noise Model (INM). The validity of the noise analysis was upheld by a Superior Court judge in 1998. Please refer to pages 39-40 of the Draft SEIR for a discussion on why the noise projections are being updated.

**RESPONSE TO COMMENT 12-F**

The City disagrees with the comments that the curfew is unenforceable and has been successfully challenged. Historic compliance with the curfew has been very high, as evidenced by the fact that

there are no scheduled commercial flights by transport category aircraft during the curfew and the number of unauthorized flights during the curfew has been very low. For example, for a 9-year period ending on 12/31/00, the number of unauthorized flights averaged less than one flight every four days.

A recent legal challenge to the curfew (*Wing & A Prayer v. City of San Jose*) did not invalidate the curfew. On June 13, 2001, the U.S. District Court for the Northern District of California granted *Wing & A Prayer* a preliminary injunction that directed the City to allow *Wing & A Prayer* to conduct curfew operations at the Airport pursuant to Section X.B.2 of the City's Noise Control Program. The Court subsequently ordered that the case be dismissed with prejudice pending the parties' agreement upon the terms of a settlement agreement. The parties have settled the case, and the City has authorized *Wing & A Prayer* to conduct curfew operations pursuant to Section X.B.2 of the City's Noise Control Program.

The City intends to continue its vigorous enforcement of the curfew, including defending it against any future legal challenges. Contrary to the comments submitted, the City has not applied to the FAA for a modification of the curfew. However, the City Council has authorized Airport staff and the City's Attorney's Office to review alternatives for a possible restructuring of the curfew, and staff has engaged in informal discussions with the FAA regarding possible restructuring alternatives.

For these reasons, there is no basis to undertake a noise analysis for a "no curfew" scenario. Such a hypothetical scenario would be speculation that is outside the requirements of CEQA.

#### **RESPONSE TO COMMENT 12-G**

As stated in the Draft SEIR, there is no basis for updating the single event analysis because the data are still accurate. This comment provides no data or information to the contrary. The only thing that has changed is the cumulative (i.e., CNEL) analysis resulting from changes in the aircraft fleet mix and the number of operations by those aircraft. Changes in cumulative noise due to September 11th - or due to any other reason(s) - would not affect single event noise levels.

#### **RESPONSE TO COMMENT 12-H**

The City is unaware of any FAA mandates for alternative flight paths at other airports that would affect flight paths to/from SJC. Pilot discretion is not a factor with the majority of flights at SJC, especially in the vicinity of the Airport where aircraft are aligned with the runways.

**RESPONSE TO COMMENT 12-I**

The SEIR noise analysis update, as well as the original EIR noise analysis, relies on standards promulgated by the FAA and the State of California. These standards were developed based upon research concerning the effects of noise on the environment. Please refer to pages 1-14 of Appendix 3.5.A in the original EIR for an in-depth discussion of this issue.

**RESPONSE TO COMMENT 12-J**

Helicopter noise is accounted for in the CNEL calculations. See Tables I and II in Appendix E of this SEIR.

**RESPONSE TO COMMENT 12-K**

Potential effects on property values are not an environmental impact under CEQA. In any case, the APM will not pass near any residences nor will it pass over any businesses.

**RESPONSE TO COMMENT 12-L**

As noted in the Draft SEIR (see Section 2.5), the APM crossing of the Guadalupe River has been specifically designed to avoid impacts to fisheries. No bridge piers will be placed in the low-flow channel and no work in the low-flow will be necessary during construction. Further, no riparian vegetation will be removed. Measures to minimize water quality impacts during construction are listed in the Draft SEIR on pages 83-84.

**RESPONSE TO COMMENT 12-M**

Native trees will not be removed unless alternatives such as trimming or avoidance are not practical.

**RESPONSE TO COMMENT 12-N**

This comment is incorrect in implying that higher APM ridership equals increases in vehicle traffic. One of the objectives and benefits of the APM is a decrease in vehicular traffic. As noted in Section 3.4 of the 1997 EIR, reducing the number of vehicle trips is one of the mitigation measures that will improve air quality.

**RESPONSE TO COMMENT 12-O**

Short-term water quality and air quality impacts/mitigation measures are described in Sections 2.13.6 and 2.13.4 of the Draft SEIR, respectively.

**RESPONSE TO COMMENT 12-P**

CEQA does not require a glossary in an EIR.

**RESPONSE TO COMMENT 12-Q**

The Draft SEIR includes a Table of Contents in the front of the document. CEQA does not require an index in an EIR.

**RESPONSE TO COMMENT 12-R**

Budgetary and cost-related analyses are not part of CEQA documents.

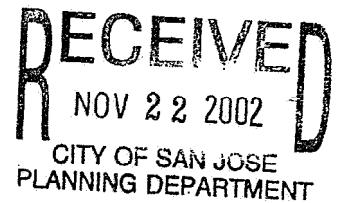
**RESPONSE TO COMMENT 12-S**

It is unclear as to what is meant by this comment. All data contained in the Draft SEIR are consistent with the standard practices and methodologies used in the various analyses typically undertaken as part of the CEQA process.

Rosemary Gardens Neighborhood Association  
Airport Issues Committee

November 22, 2002

COMMENT  
# 13



Ms. Janis Moore  
City of San Jose  
801 North First Street  
San Jose, CA 95110-1795

RE: DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE NORMAN Y. MINETA  
SAN JOSE INTERNATIONAL AIRPORT MASTER PLAN UPDATE (FILE NO. PP02-08-226)  
(SCH # 1995073066).

Dear Ms. Moore:

Thank you for the opportunity to review and provide public input for the Supplemental EIR on the Airport Master Plan. We have provided a series of Comments and Questions that we think are appropriate for responses.

Attached is the Rosemary Gardens Neighborhood Association Airport Issues Committee document named: **Comments on the Draft SEIR – 11/22/02**, 1. Automated People Mover (APM), and 2. Update of Airport Master Plan Noise Impacts.

The Mineta San Jose International Airport significantly impacts the Rosemary Gardens neighborhood. Here are the highlights.

Automated People Mover (APM)

We are concerned that the main conclusion that says "**Conclusion: The APM project will not result in any significant transportation or traffic impacts**" may not be supportable without a detailed, rigorous and realistic analysis. We think that this conclusion may be more supportable if consideration and analysis are given to having the primary terminal at Technology Drive with an extension, possibly single-tracked, to Light Rail on 1<sup>st</sup> Street. The traffic on Technology Drive is significant less than on 1<sup>st</sup> Street for all or most of the day.

Also, public parking in Rosemary Gardens for APM riders should be eliminated from any parking analysis because the Rosemary Gardens Neighborhood Association is examining "Permit Parking" due to existing issues with non-resident parking. Furthermore, by implying or stating that APM public parking is available in Rosemary Gardens will foster a situation where APM passengers right Light Rail from Gish to Metro without paying fares. "After all, it just one stop".

We view the APM as providing supplemental parking for the Airport. In our view, fares should be charged to use the APM to help offset both the construction and operating and maintenance costs.

Finally, the experiences and "lessons learned" from other world-wide cities with similar off-airport APMs need to be part of the Final Supplemental Environmental Impact Report.

Update of Airport Master Plan Noise Impacts

The Noise Impacts study needs to be separated this SEIR and considered on its own merits in another SEIR.

**Rosemary Gardens Neighborhood Association**  
Airport Issues Committee

Treat Rosemary Gardens as a contiguous neighborhood for noise mitigation activities in the Acoustical Treatment (ACT) program. In the noise context, this means using a modified 60 dB contour. ] F

The forecasting history in determining the contour lines is error-prone. "As an example, the 1997 EIR projected that the 65-dB CNEL contour in year 2000 would encompass 2,043 acres (FEIR, Table, 3.5.13). The actual 65-dB CNEL contour for year 2000 encompassed 3.790 acres, **86% larger** than the project contour." **Emphasis added.** ] G

This calls into question the methodology used in determining both the 65-dB contour and the residences included for treatment in the ACT program. While the methodology may be mandated by the FAA, it is not be appropriate for the impacted residents of San Jose and other areas. ]

Recently, the curfew restrictions on night-time operations have been successfully litigated against the City on the basis of noise levels being the governing factor instead of weight. Another carrier is currently suing the City on the similar grounds. It is possible that the whole curfew program may have to be abandoned. If the curfew is overturned, it was significant negative impacts on Rosemary Gardens and the City of San Jose. ] H

We look forward to your responses to our comments and questions.

Thank you,

*Rosemary Gardens Neighborhood Association*

**Rosemary Gardens Neighborhood Association**  
Airport Issues Committee

Ransom Fields, Chairperson  
1368 North San Pedro Street  
San Jose, CA 95110-1437  
408-437-1203  
[RansomF@pacbell.net](mailto:RansomF@pacbell.net)

Members: Patti Bossert, Lilian Dennis, Joseph Fota, Michelle Gates, Steve Gates, Ben Langedyk, Stephanie Lykam, Becky Moore

**Rosemary Gardens Neighborhood Association**

Airport Issues Committee

**Comments on the Draft SEIR – 11/22/02**

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

**SUMMARY**

**Introduction**

Here are the Comments from the Rosemary Gardens Neighborhood Association (RGNA) Airport Issues Committee (AIC) for the DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE NORMAN Y. MINETA SAN JOSE INTERNATIONAL AIRPORT MASTER PLAN UPDATE (FILE NO. PP02-08-226) (SCH # 1995073066).

The structure follows that of Table of Contents for the above referenced report. It has: Comments, Questions, and Quotes. For those sections where there are no comments, questions or quotes, there are no issues.

**Overview of Comments**

**Automated People Mover (APM)**

1. There is a definite need for an Automated People Mover from the Airport to the vicinity of the Light Rail line. I
2. A more detailed, rigorous and realistic analysis of the transportation and traffic impacts needs to be included in the Final SEIR, especially with respect to passenger loading and unloading in parking spaces on 1<sup>st</sup> Street near the APM terminal. J
3. An analysis, primarily traffic and parking, needs to be performed on the alternative which has the primary APM terminal at Technology Drive with an extension, possibly single-tracked, to 1<sup>st</sup> Street for Light Rail airport passengers. K
4. Another similar analysis is needed for the alternative which includes extending the APM to 4<sup>th</sup> Street. L

**Update of Airport Master Plan Noise Impacts**

1. The Noise Impacts study needs to be separated from this SEIR and considered on its own merits. M
2. Treat Rosemary Gardens as a contiguous neighborhood for noise mitigation activities in the Acoustical Treatment (ACT) program. In the noise context, this means using a modified 60 dB contour. N
3. Note that the current ACT program activities do not agree with Table 15 figures for Cat 1 of 135 and Cat 2 of 100 for a total of 235 dwelling units. This represents about 50% of the residences in Rosemary Gardens. O
4. An immediate improvement to reduce noise in Rosemary Gardens is to use 30L for both arrivals and departures when practical. P

**Members of Rosemary Gardens Neighborhood Association Airport Issues Committee**

**Chairperson:** Ransom Fields, 408-437-1203

**Members:** Patti Bossert, Lilian Dennis, Joseph Fota, Michelle Gates, Steve Gates, Ben Langedyk, Stephanie Lykam, Becky Moore

**Formatting Conventions Used**

The formatting follows that used in the DRAFT SEIR with the following exceptions. The 4<sup>th</sup> level (x.x.x.x) is out-dented to the margin and numbered. 5<sup>th</sup> level comments are unnumbered.

Rosemary Gardens Neighborhood Association

Airport Issues Committee

Comments on the Draft SEIR – 11/22/02

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

## SECTION 1 DESCRIPTION OF THE PROPOSED PROJECT

- 1.1 PROJECT OVERVIEW
- 1.2 PROJECT LOCATION
- 1.3 BACKGROUND AND NEED FOR PROJECT
- 1.4 DETAILED DESCRIPTION OF PROJECT
  - 1.4.1 APM Technology
  - 1.4.2 APM Alignment
  - 1.4.3 APM Stations
    - 1.4.3.1 Comment: see 2.1.2.9 to 2.1.2.12 below.
  - 1.4.4 Other Project Components
  - 1.4.5 APM Operations
    - 1.4.5.1 Hours of operation: 4 a.m. to 12:30 a.m. daily. Comment: this is 20.5 hours per day.
  - 1.4.6 Right-of-Way Requirements
  - 1.4.7 Projected APM Ridership
    - 1.4.7.1 Statement: Table 5 shows a forecasted APM ridership for year 2010 of 2,520 passengers per day.
    - 1.4.7.2 **Question**: what is the basis for this number? — Q — R — S
    - 1.4.7.3 **Question**: who are the 410 bus riders for 2010?
    - 1.4.7.4 **Question**: what are the associated bus routes (#10, etc.)?
  - 1.4.8 Relationship to Other APM Projects/Future APM Extensions
- 1.5 CONFORMANCE WITH RELEVANT PLANS, GOALS AND POLICIES
  - 1.5.1 Valley Transportation Plan 2020
  - 1.5.2 San Jose Horizon 2020 General Plan
  - 1.5.3 SJC Master Plan
  - 1.5.4 San Jose Traffic Relief Ordinance
  - 1.5.5 Clean Air Plans
- 1.6 USES OF THE SEIR AND PERMITS REQUIRED

## SECTION 2 ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION

### 2.1 TRANSPORTATION AND TRAFFIC

#### 2.1.1 Existing Conditions

- 2.1.1.1 In Table 7, from 1<sup>st</sup> and Gish to 1<sup>st</sup> and Metro, the existing LOS ranges from B (6) to C+ (2), for 2010 background and project, the LOS ranges from B (2), C (4) to D (2). This is a significantly negative situation with or without the project.
- 2.1.1.2 **Question**: Why weren't 1<sup>st</sup> and I-880 and 1<sup>st</sup> and Rosemary intersections included in the table?
- 2.1.1.3 Comment: Please provide the most up-to date data for all of the intersections including I-880 and Rosemary Street.
- 2.1.1.4 Comment: At 1<sup>st</sup> Street, Rosemary, Gish and Sonora are the only streets that permit access to Rosemary Gardens. There are no other access points!
- 2.1.1.5 On p. 27, it says "If this were to occur to a substantial degree, the concern is that a shortage of parking in the existing commercial and residential areas might result."
  - Question**: Is this parking short-term, measured in minutes, intermediate, measured in hours, or long-term, measured in days?
  - Question**: If it is mixed, what is the distribution between short, intermediate and long-term parking?
  - Question**: Did the parking analysis include the impact of the 72-hour parking restriction?
  - Question**: What consideration has been given to using the VTA fare structure for the APM?



**Rosemary Gardens Neighborhood Association**

Airport Issues Committee

**Comments on the Draft SEIR – 11/22/02**

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

**Question:** When, where and by whom was the decision made that the APM would be a “no-fare” operation?

**Comment:** Parking in Rosemary Gardens should be eliminated from any parking analysis because the Rosemary Gardens Neighborhood Association is considering “Permit Parking” to alleviate current parking problems.

**2.1.2 Transportation and Traffic Impacts**

- 2.1.2.1 **Question:** In the **Intersection Impacts**, and **Impacts Associated with Passenger Pick-Ups and Drop-Offs** sections or any other relevant sections, did the traffic analysis include the significant slowing of through traffic due to cars pulling into and out of parking spaces near the APM on 1<sup>st</sup> Street?
- 2.1.2.2 **Question:** Were simulations or other forms of detailed analysis performed to show the impacts from both the increased traffic generated by the APM and the car pulling into and out of parking spaces?
- 2.1.2.3 **Question:** Did the analysis consider the impact of passengers crossing 1<sup>st</sup> Street to get up or down from the APM platform?
- 2.1.2.4 **Question:** Did the analysis consider looking at the actual operations of similar off-airport APM systems in other cities in the United States and the rest of the world? If yes, please provide a comparative analysis. If no, please provide a comparative analysis for 3 to 4 systems.
- 2.1.2.5 **Question:** If other systems were examined, did the analysis compare the actual operations with the planned operations that were used to support funding and building of the APM systems?
- 2.1.2.6 **Question:** If other systems were examined, will these analyses be included in the final EIR?
- 2.1.2.7 **Comment:** the slowing of traffic from drivers looking for parking spaces is another consideration. Figure 10 shows the “On-street pull-outs” immediately adjacent to the through lanes.
- 2.1.2.8 **Comment:** There is virtually no parking on either side of 1<sup>st</sup> Street from US 101 to I-880 and beyond.
- 2.1.2.9 The “**Conclusion: The APM project will not result in any significant transportation or traffic impacts**” may not be supportable without a detailed, rigorous and realistic analysis.
- 2.1.2.10 **Comment:** this conclusion may be more supportable if consideration and analysis are given to having the primary terminal at Technology Drive with a spur, possibly single-tracked, to Light Rail on 1<sup>st</sup> Street.
- 2.1.2.11 **Comment:** The traffic on Technology Drive is significant less than on 1<sup>st</sup> Street for all or most of the day. Existing traffic analysis should verify these observations.
- 2.1.2.12 **Question:** Has the APM planning team examined having a station at Technology Drive or at 4<sup>th</sup> Street?
- 2.1.2.13 **Question:** Has the APM planning team examined any other less impacted areas?

**2.2 NOISE**

**2.2.1 Noise Setting & Impacts Associated with the APM**

**2.2.1.1 Conclusion:** The APM project will not result in any significant noise impacts.

**2.2.2 Updated Master Plan Noise Analysis**

- a. **Comment:** We find it particularly interesting that the “Updated Master Plan Noise Analysis” is included in this SEIR because of the conclusion reached in the above section “Noise Setting & Impacts Associated with the APM”.
- b. **Question:** Who and when was the decision made to include the “Updated Master Plan Noise Analysis” in this SEIR, especially as a sub-section under NOISE?

Rosemary Gardens Neighborhood Association

Airport Issues Committee

Comments on the Draft SEIR – 11/22/02

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

- c. **Question:** Should the "Updated *Master Plan* Noise Analysis" be a separate SEIR?

2.2.2.1 Introduction & Background

**Quote:** In this section: ...input to the INM that included the following: 1) **forecasted** airport activity levels for air passenger service, air cargo service, and general aviation, 2) **projected** numbers of aircraft operations during the daytime, evening, and nighttime periods; 3) **projected** aircraft fleet mix, 4) **projected** aircraft destinations, and 5) **assumptions** pertaining to runway and flight track usage. **Emphasis added.**

Two paragraphs later, the **Quote:** is "As an example, the 1997 EIR projected that the 65-dB CNEL contour in year 2000 would encompass 2,043 acres (FEIR, Table, 3.5.13). The actual 65-dB CNEL contour for year 2000 encompassed 3,790 acres, **86% larger** than the project contour." **Emphasis added.**

In the next paragraph, the **Quote:** is "This unanticipated increase in the size of the SIC noise contours meant that certain residential neighborhoods, not previously included in the Airport's Acoustical Treatment (ACT) Program, were remaining exposed to noise levels that warrant inclusion in the ACT program."

Finally, in the last paragraph of this section, the **Quote** is: "In view of this new information, the City has determined that an update of the 1997 EIR noise analysis is required the CEQA before further discretionary actions to implement various *Master Plan* capital improvement project are taken."

**Comment:** The above calls into question the methodology used in determining both the 65-dB contour and the residences included for treatment in the ACT program. While the methodology may be mandated by the FAA, it is not be appropriate for the impacted residents of San Jose and other areas.

**Question:** Can the methodology be improved by using more current and sophisticated analysis, statistical and decision-making techniques?

**Question:** Is it possible to treat entire neighborhoods (read: Rosemary Gardens) under the ACT program, rather than using an arbitrary contour line, based on **forecasted** levels, **projected** operations, fleet mix and destinations, and **assumptions** about runway usage and flight tracks?

**Comment:** A contour line is a planning convenience, but not necessarily, realistic. To state the obvious, the determination of any contour line is a dynamic process subject to change based on any number of factors. To be blunt, a contour line is a statistical fiction. Moreover, to use a point solution for a statistical process is inappropriate, and as shown above, misleading. For planning purposes, not only does the point solution (the mean) but the dispersion of the various cases examined (the variance) need to be included in the analysis. Only then, can reasonable judgments be made.

**Comment:** Moreover, the CNEL methodology essentially is a yearly average. It does not accurately reflect well-know seasonal patterns at the Airport.

2.2.2.2 Outline of Noise Analysis Update

**Comment:** The **Existing** scenario is based on a 1-year period ending March 31, 2002. This period includes the tragedy of 9/11/01 and the four day quiet period that followed when virtually all aircraft were grounded. Four days is roughly 1% of the days in this period.

**Question:** Is this the correct period? If yes, why? How were the 4 day quiet period handled? If not, what period should be used?

**Comment:** The **No Project** scenario is a modified version of the "Existing" scenario that takes into account anticipated changes in runway usage. From anecdotal data from the ANAC meeting in November, pilots prefer to use the "easterly" (12L-30R) runway for both arrivals and departures because it allows them to get to and from the terminal faster.

**Rosemary Gardens Neighborhood Association**

Airport Issues Committee

**Comments on the Draft SEIR – 11/22/02**

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

From a perceptual level, the noise from the airport has increased since the opening of the "easterly" runway that is closest to Rosemary Gardens.

**Question:** Does the Integrated Noise Model (INM) account for the weather conditions, specifically, noise or sound propagation as affected by the temperature and humidity patterns during the year?

**Question:** Does the Integrated Noise Model (INM) account for the weather conditions, specifically, noise reflection from the atmospheric variations during certain periods of the year?

**Question:** Are modifications or adjustments made to the contour lines to take into consideration the effects of temperature, humidity and other relevant factors which affect sound propagation?

**Comment:** If it does not, the contour lines may be significantly in error.

**Comment:** the **Master Plan/Year 2010** is based on the approved **Master Plan**, developed in the Master Plan EIR, 1997.

**Question:** Are the assumptions made in **Master Plan/Year 2010** still valid?

**Comment:** Obviously, 9/11/01 has had a major impact on the perception of the safety and delays in traveling by air.

**Comment:** Recently, the curfew has been successfully litigated on the basis of noise vs. weight. Another carrier is currently suing the City on the similar grounds. It is possible that the whole curfew program may have to be abandoned.

**Question:** What changes will occur in the contours if the curfew is eliminated?

**Comment:** The current FAA weighting is 10X for night arrivals and departures vs. the 3X weighting for evening activities.

**Comment:** It seems that there has been increase of military aircraft landing and taking off from SJC after 9/11/01.

**Question:** Are these military activities included in the noise analysis?

**2.2.2.3 Noise Analysis Assumptions & Methodology**

**Comment:** See **Appendix E – Updated Master Plan Noise Analysis** for additional information on the effects of temperature and humidity variations on sound (noise) propagation and attenuation.

**2.2.2.4 No Project Noise Levels**

**2.2.2.5 Master Plan/Year 2010 Noise Levels**

**2.2.2.6 Mitigation for Significant Noise Impacts**

**2.3 VIBRATION**

**SECTION 3 ALTERNATIVES**

**SECTION 4 SCOPING AND COORDINATION**

**SECTION 5 LIST OF PREPARERS**

**SECTION 6 REFERENCES CITED**

**Appendix A**

**Appendix B**

**Appendix C**

**Appendix D**

**Appendix E Updated Master Plan Noise Analysis**

AN  
AO  
AP  
AQ  
JAR  
AS

Section 2 - Responses to Comments

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**Rosemary Gardens Neighborhood Association**  
Airport Issues Committee

**Comments on the Draft SEIR – 11/22/02**

1. Automated People Mover (APM)
2. Update of Airport Master Plan Noise Impacts

Comment: from the FAA web site (<http://www.aee.faa.gov/Noise/inm/>), here is their verbatim statement:

The INM aircraft profile and noise calculation algorithms are based on several guidance documents published by the Society of Automotive Engineers (SAE). These include the SAE-AIR-1845 report titled "Procedure for the Calculation of Airplane Noise in the Vicinity of Airports" as well as others which address atmospheric absorption and noise attenuation. The INM is an average-value-model and is designed to estimate long-term average effects using average annual input conditions. Because of this, differences between predicated and measured values can occur because certain local acoustical variables are not averaged, or because they may not be explicitly modeled in INM. Examples of detailed local acoustical variables include temperature profiles, wind gradients, humidity effects, ground absorption, individual aircraft directivity patterns and sound diffraction terrain, buildings, barriers, etc. Difference may also occur due to errors or improper procedures employed during the collection of the measured data.

Here is one study of the sound attenuation relationship to temperature and humidity for various temperatures and ranges of humidity.

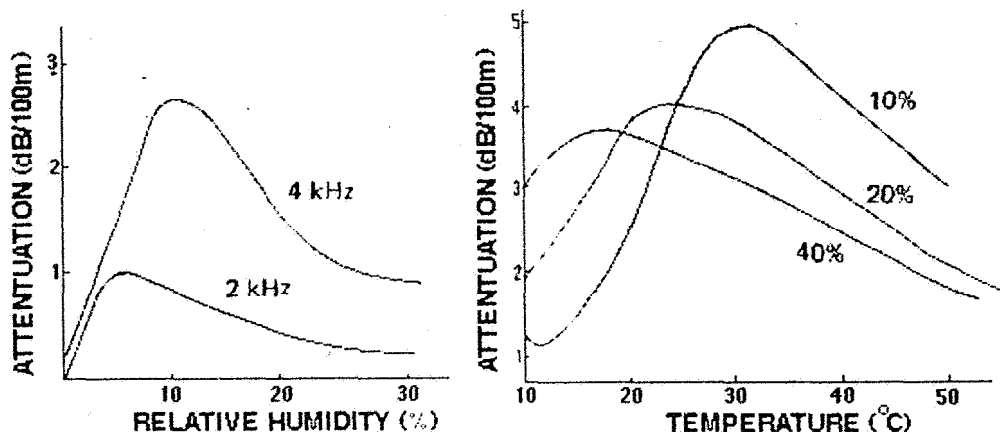
The United States equivalents for temperatures are:

10° C = 50° F, 20° C = 68° F, 30° C = 86° F, 40° C = 104° F, 50° C = 122° F

100 meters (100m) is 109.36 yards or 328.08 feet.

The "easterly" runway is about 750 feet closer to Rosemary Gardens than the "westerly" runway, or about 228.6 meters or 2.286 per 100 meters.

At 10° C or 50° F, we can expect somewhere between approximately 2-6 dB of attenuation while at 30° C or 86° F, the attenuation is in the 4-10 dB range. So, in winter time, the attenuation of the aircraft noise is lower by 2 to 4 dB. In other words, it is noisier by 2 to 4 dB in the winter than the summer. This is equivalent to moving the 65 CNEL line further to the east encompassing more of the Rosemary Gardens residences. The winter time is also the time when more flights are taking off to the south. People with more acoustical experience should be able to give more accurate results for monthly variations in attenuation vs. temperature and humidity.



Ref.: Cyril Harris, "Absorption of Sound in Air versus Humidity and Temperature," *Journal of the Acoustical Society of America*, 40, p. 148.

*Section 2 - Responses to Comments*

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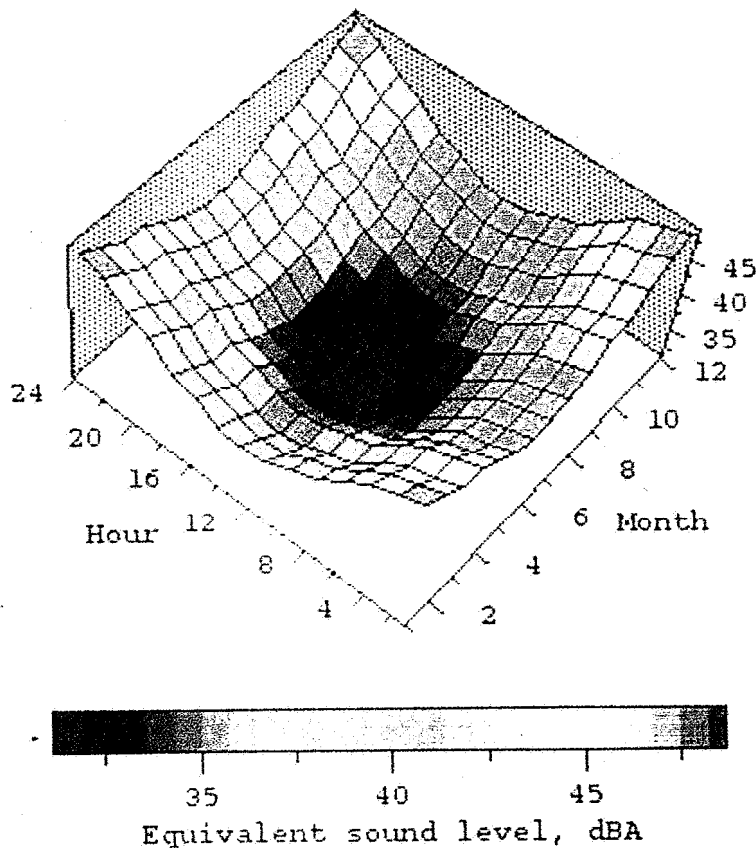
**Rosemary Gardens Neighborhood Association**  
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2. Update of Airport Master Plan Noise Impacts

Here is a Swedish study (<http://www.met.uu.se/eng/forsk/noise.html>) that shows similar conclusions:

The author says:

"The weather has a fundamental influence of the sound propagation outdoors. The results from the research could be used in planning and when doing sound measurements outdoors. Errors of the order of 20 dBA could be introduced if weather is not taken into account.

Most quite during the summer afternoons and the highest noise levels will occur during winter nights. The red colour indicates times when fighting the noise gives most for the money."



**Appendix F**  
**Appendix G**

**RESPONSES TO COMMENT #13:**  
**ROSEMARY GARDENS NEIGHBORHOOD ASSOCIATION**

**RESPONSE TO COMMENT 13-A**

The Draft SEIR does include a detailed traffic and parking analysis. That analysis is contained in Appendix C of the Draft SEIR. The traffic analysis concludes that traffic impacts will not be significant. This comment does not provide any data or information to the contrary.

Terminating the APM on Technology Drive or single-tracking the APM to the LRT at North First Street would be inconsistent with a primary goal of the project, which is to provide a convenient and efficient connection between the Airport and the LRT.

**RESPONSE TO COMMENT 13-B**

The City is neither intending nor expecting APM patrons to park in the Rosemary Gardens Neighborhood. Many LRT stations have parking lots, including some parking spaces dedicated for use by Airport passengers and employees. These spaces provide parking for Airport patrons using the LRT, including future transfers from the LRT to the APM.

The purpose of including the Rosemary Gardens Neighborhood in the parking supply survey was to make sure that any potential for the neighborhood to be used for parking by APM patrons was thoroughly analyzed in the SEIR. The City had received requests for such an analysis from residents of the Rosemary Gardens Neighborhood who attended the various community meetings that were held on the project.

**RESPONSE TO COMMENT 13-C**

The opinion of the commentor is noted. The intent of the APM is to improve transit facilities as a way of reducing Airport-related automobile traffic. This benefit of the APM is one of the reasons that community and neighborhood organizations have been encouraging the City to improve transit links to the Airport.

**RESPONSE TO COMMENT 13-D**

The City is not aware of any unforeseen environmental impacts regarding APM projects at other airports. No information is provided regarding the meaning of "lessons learned". Therefore, no response is possible.

**RESPONSE TO COMMENT 13-E**

This SEIR is the appropriate document for the update of the *Master Plan* noise analysis. Please see the response to Comment #11-I on page 36 for the reasons the SEIR addresses both the APM and the update of the *Master Plan* noise analysis.

**RESPONSE TO COMMENT 13-F**

The opinion of the commentator that the entire Rosemary Gardens Neighborhood should be treated as a contiguous unit is noted. As described on page 53 of the Draft SEIR, the ACT Program contains three categories, each of which is based upon the degree to which residences are impacted by aircraft noise. These criteria are applied equitably to all neighborhoods in both San Jose and Santa Clara.

In the case of Rosemary Gardens, because the aircraft-related noise level varies within the neighborhood, some homes are Category 1, some are Category 2, some are Category 3, and some are outside the ACT Program boundaries entirely (see Figure 15). Under these circumstances, to treat the entire Rosemary Gardens Neighborhood as Category 1, for example, would not be warranted and would be unfair to other neighborhoods.

**RESPONSE TO COMMENT 13-G**

Projections of noise, like all projections, are based on assumptions using the best available information at the time the projections are made. If projections turn out to be inaccurate, it may be that the methodology or assumptions or both were flawed. In this case, some of the original assumptions with regard to aircraft types turned out to be inaccurate based upon unforeseen decisions by the airlines, not an error in the methodology. Please refer to pages 39-40 of the Draft SEIR for a discussion on why the noise projections are being updated.

**RESPONSE TO COMMENT 13-H**

Please see the response to Comment #12-F on page 43 for an overview of the lawsuit related to the curfew and the City's intention regarding the curfew.

**RESPONSE TO COMMENT 13-I**

This comment acknowledging the need for the APM is noted for the record.

**RESPONSE TO COMMENT 13-J**

This comment is the same as Comment #13-A. Please see the response to Comment #13-A.

**RESPONSE TO COMMENT 13-K**

This comment is the same as Comment #13-A. Please see the response to Comment #13-A.

**RESPONSE TO COMMENT 13-L**

There are no plans to extend the APM to North Fourth Street.

**RESPONSE TO COMMENT 13-M**

This comment is the same as Comment #13-E. Please see the response to Comment #13-E.

**RESPONSE TO COMMENT 13-N**

This comment is the same as Comment #13-F. Please see the response to Comment #13-F.

**RESPONSE TO COMMENT 13-O**

Table 15 lists only Category 1 and Category 2 residences. Not included in Table 15, but shown on Figure 15, are those residences of the Rosemary Gardens Neighborhood that are Category 3. The balance of the residences are outside the ACT Program boundaries (i.e., outside the projected 60-dB CNEL contour).

**RESPONSE TO COMMENT 13-P**

For a discussion of limiting Runway 30R to "back-up" usage, please see the response to Comment #15-I on page 83.



**RESPONSE TO COMMENT 13-Q**

Page 15 of the Draft SEIR summarizes the methodology employed to develop the APM ridership projections. That same page references the technical report that was prepared for APM ridership and includes information as to how the technical report can be reviewed.

**RESPONSE TO COMMENT 13-R**

These are air passengers and employees who would ride the *Airport Flyer* bus between the Santa Clara Caltrain Station and the Airport.

**RESPONSE TO COMMENT 13-S**

VTA bus route #10 and the *Airport Flyer* are synonymous.

**RESPONSE TO COMMENT 13-T**

These intersections were beyond the study area, the study area being centered on North First Street at Century Center Court. The study intersections were limited to those shown on Figure 5 of the Draft SEIR due to the relatively low number of vehicle trips associated with the APM at the North First Street Station.

**RESPONSE TO COMMENT 13-U**

The Draft SEIR does contain traffic data for current (year 2002) conditions.

**RESPONSE TO COMMENT 13-V**

Comment noted.

**RESPONSE TO COMMENT 13-W**

The discussion on page 27 is primarily related to addressing the potential for long-term (i.e., one or more days) parking to occur in the area.

**RESPONSE TO COMMENT 13-X**

The parking analysis took into account both supply and demand. In addition to the parking analysis contained in the Draft SEIR, please see the responses to Comment #14 for further discussion of the parking issue. City regulations regarding the length of time a vehicle can be parked on a street without being moved were not relevant to the analysis.

**RESPONSE TO COMMENT 13-Y**

The "no fare" APM policy continues the existing "no fare" *Airport Flyer* policy that was approved by the VTA Board of Directors and the San Jose City Council.

**RESPONSE TO COMMENT 13-Z**

This comment is the same as Comment #13-B. Please see the response to Comment #13-B.

**RESPONSE TO COMMENT 13-AA**

The impact of drop-offs and pick-ups on traffic flow will be negligible because 1) this activity will not be substantial, 2) parking spaces out of the traffic lanes will be provided, and 3) there will be breaks in the North First Street traffic flow due to existing traffic signals both north and south of the APM station.

**RESPONSE TO COMMENT 13-AB**

Yes. Pedestrian impacts, including the effects of the new signal at Century Center Court, were taken into account. See page 32 of the Draft SEIR.

**RESPONSE TO COMMENT 13-AC**

APM/LRT interface and operations are unique to this location and cannot be compared to other airports. Each location served by an APM has its own set of forecasts and local conditions. Economic studies associated with the APM, such as cost-benefit analyses, are not germane to the disclosure of environmental impacts under CEQA.

**RESPONSE TO COMMENT 13-AD**

This comment is the same as Comment #13-AA. Please see the response to Comment #13-AA.

**RESPONSE TO COMMENT 13-AE**

Comment noted. This comment is consistent with information in the Draft SEIR.

**RESPONSE TO COMMENT 13-AF**

This comment is the same as Comment #13-J. Please see the response to Comment #13-J.

**RESPONSE TO COMMENT 13-AG**

This comment is the same as Comments #13-A and #13-L. Please see the responses to Comments #13-A and #13-L.

**RESPONSE TO COMMENT 13-AH**

This SEIR is the appropriate document for the update of the *Master Plan* noise analysis. Please see the response to Comment #11-I on page 36 for the reasons the SEIR addresses both the APM and the update of the *Master Plan* noise analysis.

**RESPONSE TO COMMENT 13-AI**

This comment is the same as Comment #13-G. Please see the response to Comment #13-G.

**RESPONSE TO COMMENT 13-AJ**

The methodology utilized in the noise report for SJC is the same as that used at all airports, consistent with FAA requirements. The methodology utilizes the most current version of the FAA's Integrated Noise Model (INM). The INM is updated from time to time by the FAA with the goal of having noise projections that are as accurate as possible, taking into account the best available information including the newest models of aircraft.

**RESPONSE TO COMMENT 13-AK**

This comment is the same as Comment #13-F. Please see the response to Comment #13-F.

**RESPONSE TO COMMENT 13-AL**

The use of the CNEL contour is the best tool for objectively quantifying noise in the vicinity of an airport. The use of the CNEL is required by both the FAA and the State of California. The CNEL is designed to provide the public and decision-makers with the complete picture, and is the standard used at all airports in California.

The use of the CNEL is analogous to the use of the day-night level (Ldn) by the City when quantifying non-aircraft noise levels (e.g., traffic) throughout the community. The Ldn presents the total noise environment for a typical day, taking into account the time of day the noise events occur.

**RESPONSE TO COMMENT 13-AM**

For an explanation as to how and why the "existing" period was chosen, please see the response to Comment #11-K on page 36.

**RESPONSE TO COMMENT 13-AN**

Most aircraft, especially those operated by the airlines, use Runway 12R/30L for landing because that is the runway that is equipped with an Instrument Landing System (ILS). The perception that use of Runway 12L/30R by large jets has increased noise in the Rosemary Gardens Neighborhood is correct. This easterly increase in noise was one of the impacts of the *Master Plan* that was disclosed in the original EIR.

**RESPONSE TO COMMENT 13-AO**

Please refer to the response to Comment #11-M on page 37.

**RESPONSE TO COMMENT 13-AP**

Based on a comparison of actual activity levels to those projected in the *Master Plan*, the City believes that the 2010 forecasts are still valid. This comparison is part of a report on the *Master Plan* that is submitted to the City Council on an annual basis.

**RESPONSE TO COMMENT 13-AQ**

Please see the response to Comment #13-F on page 57.

**RESPONSE TO COMMENT 13-AR**

This is a correct statement of weighting under the CNEL.

**RESPONSE TO COMMENT 13-AS**

Military operations are accounted for in the noise analysis.

**RESPONSE TO COMMENT 13-AT**

This comment includes an excerpt from the FAA's website regarding the effects of certain meteorological conditions on noise. As the FAA notes, "The INM is an average-value model and is designed to estimate long-term average effects using average annual input conditions." CNEL contours in the SEIR represent, by definition, an *average* annual day. This means that on certain days, conditions may result in higher than average noise, while on other days conditions may result in lower than average noise. Daily fluctuations result from differences in runway usage, numbers and types of aircraft operations, time of day of aircraft operations, meteorological conditions, and/or a combination of these and other factors. This is no different than hourly, daily, and seasonal fluctuations in noise from vehicles on highways.

This fluctuation in noise can be seen by looking at the daily CNEL values for Aircraft Noise Monitoring Site #13 in the Rosemary Gardens Neighborhood, as reported to the State of California in the quarterly noise reports. In December 2001, for example, daily CNEL values at Site #13 ranged from 55.1 decibels to 68.4 decibels, a spread of 13.3 decibels.

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COMMENT #14

November 22, 2002

### VIA HAND DELIVERY

Stephen Haase, AICP, Director  
San Jose Department of Planning, Building and Code Enforcement  
801 North First Street, Room 400  
San Jose, CA 95110-1795

RECEIVED  
NOV 22 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT

Re: Response in Opposition to Certification of Draft Supplemental Environmental  
Impact Report for Norman Y. Mineta San Jose International Airport Master Plan  
Update, SCH No. 1999073066  
City of San Jose File No. PP02-226

Dear Mr. Haase:

On behalf of Messrs. Ralph Borelli and Russ Filice and Airport IV, we respectfully submit this letter in opposition to the certification of the Draft Supplemental Environmental Impact Report for Norman Y. Mineta San Jose International Airport Master Plan Update ("Draft SEIR") until potential environmental effects are mitigated. The Draft SEIR was prepared to analyze the potential environmental effects of a proposed Automated People Mover ("APM") to transport airline travelers and employees between the San Jose International Airport and the proposed North First Street APM station ("Project"). However, the Draft SEIR fails to analyze how many daily and peak hour vehicle trips will be generated by people who drive to the North First Street APM station ("APM Station") and park to board the APM, and analyze and mitigate the resulting traffic and parking impacts.

Messrs. Ralph Borelli and Russ Filice do not oppose the construction of the Project once traffic and parking impacts are properly analyzed and adequate mitigation measures are identified and implemented. However, further environmental review is necessary because the Draft SEIR underestimates APM use and resulting traffic and parking impacts. Further, the

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Draft SEIR does not identify any public parking that is available for patrons at the APM Station. Therefore, the Project as proposed will adversely affect the nearby area and private properties as patrons, drive to the APM Station and park free to board the APM. For these reasons which are set forth more fully below, Messrs. Ralph Borelli and Russ Filice request the City to decline to certify the Draft SEIR until the City has taken into account the traffic impacts and parking needs that will be generated by the Project, and mitigated those impacts and needs.

A. The Draft SEIR Is Inadequate Because It Underestimates APM Ridership, and Does Not Take into Account the Traffic and Parking Impacts That Will Be Generated by Persons Who Will Park Near the APM Station.

The California Environmental Quality Act of 1970 ("CEQA"), Cal. Pub. Res. Code § 21000, *et seq.*, was enacted by the Legislature to "assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects." (Pub. Res. Code § 21002.) The City is required pursuant to CEQA to make determinations and decisions that are supported by substantial evidence. *See, No Oil, Inc. v. City of Los Angeles*, 13 Cal.3d 68, 74 fn. 3 (1974). Under CEQA, "substantial evidence includes fact, a reasonable assumption predicated upon fact, or expert opinion supported by fact." (Pub. Res. Code § 21080(e)(1).) Unsubstantiated opinion or narrative, and evidence that is clearly inaccurate or erroneous are not substantial evidence. (Pub. Res. Code § 21080(e)(2).) The Draft SEIR is inadequate because it reaches conclusions with regard to traffic and parking impacts that are not supported by substantial evidence.

1. The Draft SEIR is inadequate because it underestimates the number of airline travelers and employees who will use the APM.

The information and analysis in the Draft SEIR regarding traffic and parking around the APM Station is inadequate because it is based on an underestimation of projected APM ridership. To formulate conclusions of the potential impacts of the proposed APM to the APM Station area, the Draft SEIR and the Korve Study adopt certain assumptions without independent analysis based on a study by Dowling Associates, Inc., entitled "Final Report: San Jose International Airport Transit Connection Ridership" dated June 14, 2002 ("Dowling Report"). (Draft SEIR at 15 n. 9; Korve Study at 4.) Citing the Dowling Report, the Draft SEIR and Korve Study forecast APM ridership to be 2,520 passengers in the year 2010. (Draft SEIR at 15.) The assumption, and the conclusions of traffic and parking impact arising out of that assumption, are unsubstantiated and erroneous because the Dowling Report found that on approximately 100 days per year, the ridership will reach 2,910 passengers. (Dowling Report at iv.)

In determining the potential significant effects of the Project, the City was required under CEQA to analyze the Project based on the 2,910 passengers that will ride the APM on approximately 100 days of every year. *See, e.g., Laurel Heights Improvement Assn. v. Regents of University of California*, 6 Cal.4th 1112, 1138 (1993), and *Hermosa Beach Stop Oil Coalition v. City of Hermosa Beach*, 86 Cal.4th 534, 566 (2001) (discussing environmental report based upon "worst case" scenario). Because the Draft SEIR does not analyze the impacts of the total number of riders, the decisionmakers will be unable to determine from the information and

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analysis in the Draft SEIR what are the adverse effects of the Project on traffic and parking and other aspects of the environment. Los Angeles Unified School District v. City of Los Angeles, 58 Cal.App.4th 1019, 1025-26 (1997) ("We do not know the answer to this question but, more important, neither does the City; and because the City does not know the answer, the information and analysis in the EIR regarding noise levels around the school is inadequate.")

2. The Draft SEIR does not contain any substantial evidence to support a conclusion that the APM will not have significant traffic impacts and will not cause parking impacts.

The Kolve Study is inadequate under CEQA because it unreasonably assumes without any substantial evidence to support the assumption that *not one* of the projected 2,900 or 2,520 daily APM riders will drive their cars to the APM Station. (Draft SEIR at 15; Kolve Study at 19.) The Kolve Study does not cite any facts to support an expert opinion regarding the number of APM users who will drive and park to use the APM Station or the result of those vehicle trips on traffic and parking.

The Draft SEIR should analyze the degree to which future users of the APM will use existing on-street and off-street parking to access the APM. According to the Dowling Report, approximately 14% of current Airport Flyer passengers drive their vehicles to the Airport Flyer station and park for free -- a greater number than the number of Airport Flyer passengers that are picked up and dropped off at the station. (Dowling Report at 4.) It is reasonable to assume that APM passengers also will drive to the APM Station and park for free as an alternative to paying Airport parking rates currently set at \$25 and \$30 dollars per day or dealing with transit, which many people perceive as inconvenient. (Hexagon Traffic Study at 1; Dowling Report at E-3.) As its reason for not analyzing these impacts, the Draft SEIR states:

The degree to which future users of the APM might use existing on- and off-street parking cannot be quantified with any degree of accuracy and would be speculation, the potential for this to occur will depend on the degree to which future Airport users perceive parking near the APM as more convenient than parking on-Airport, factoring in future on-Airport parking rates, both of which are unknowns and speculative.

(Draft SEIR at 34.) The Draft SEIR's approach is flawed under CEQA because a public agency cannot simply label and impact "remote" or "speculative" and decline to address it." Napa Citizens for Honest Government v. Napa County Board of Supervisors, 91 Cal.App.4th 342, 373 (2001). Furthermore, such an analysis would be no more unknown or speculative than other impacts quantified under the Draft SEIR, such as the number of projected daily riders, which the Draft SEIR breaks down by employees and airline travelers; and the total additional overall and peak traffic generated by persons dropping off and picking up APM passengers. (Kolve at 4-5, 19.)

In fact, the number of vehicle trips and parking needs generated by persons driving to the APM Station can be quantified, and nothing in the Kolve Study states to the contrary. The attached study performed by Hexagon Transportation Consultants ("Hexagon Traffic Study") analyzes future airport parking needs and based on the Draft SEIR's figure of 2,520 projected



Stephen Haase  
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riders, concludes that the APM Station area will be impacted by between 500 and 1,000 vehicles per day resulting from APM riders who drive to the APM station to park and ride the APM. (Hexagon Traffic Study at 2.) The City needs to analyze the effects of these projected 500 or 1,000 vehicles on traffic and parking. C

3. The parking count contained in the Draft SEIR fails to identify any parking that is available to APM patrons.

The Draft SEIR does not identify any available parking for APM riders who drive to the APM Station. All off-street parking lots in the vicinity, whether demarcated with tow away signs and gates or not, are privately owned and reserved for use by the adjacent building occupants and customers. (Hexagon Traffic Study at 2.) None of the off-street parking lots are designated as public parking facilities and therefore, they may not be included when calculating APM parking spaces. As the property owners of four of the buildings and parking lots within a five-minute walk of the proposed APM Station, some of which are characterized in the Draft SEIR as "restricted" and some of which are characterized as "unrestricted," Messrs. Borelli and Filice strenuously object to the City's inclusion of their properties among the APM parking count. D

The Draft SEIR does not show that any of the on-street parking spaces counted are unused and available to APM riders. The Korve Study found only 22 unrestricted public parking spaces within a five-minute walk of the proposed APM Station, and only 58 unrestricted public parking spaces within a ten-minute walk of the APM Station. (Korve Study at 9; Draft SEIR at 28.) Although the Korve Study counted vacant off-street private parking stalls, no occupancy survey of on-street parking spaces was performed. (Korve Study at 9.) The Hexagon Traffic Study did perform an occupancy survey of on-street parking spaces, and found that the parking spaces within a five-minute walk from the APM Station were 80% occupied on an average weekday and that "essentially there are no available unrestricted public parking spaces near the proposed APM station." (Hexagon Traffic Study at 2.) The Korve Study similarly finds that on-street parking space occupancy rates are "high" within a five minutes walk of the APM, and that on-street parking space occupancy rates are "considerably lower" when the walking time exceeds ten minutes. (Korve Study at 9.) The Korve Study further finds, however, that these "[p]arking spaces beyond a 10 minute walk would not be expected to be used because of the distance involved and the availability of closer parking." (Korve Study at 17.) Therefore, the Korve finds that only 80 unrestricted public parking exist that APM patrons are likely to use. There is no substantial evidence that 80 spaces would be sufficient, even if they were available for APM riders' use. This constricted parking situation may be even worse under the Project, as the number of on-street parking spaces within a five-minute walk of the APM Station may be reduced to 18. (Draft SEIR at 32.)

B. The Draft SEIR Is Flawed Because It Fails to Require Mitigation Measures That Will Adequately Address the Project's Impacts of Traffic and Parking.

Because the Draft SEIR does not adequately assess the impacts of the Project on traffic and parking, the Draft SEIR does not contain mitigation measures to address potential significant traffic and parking impacts of the Project. CEQA requires the City to assure that the Project's E

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potential significant effects will be avoided or mitigated to a less than significant level by requiring or incorporating mitigation measures. In Federation of Hillside and Canyon Associations v. City of Los Angeles, 83 Cal.App.4th 1252, 1260-61 (2000), the court explained:

CEQA requires the agency to find, based on substantial evidence, that the mitigation measures are "required in, or incorporated into, the project"; or that the measures are the responsibility of another agency and have been, or can and should be, adopted by the other agency; or that mitigation is infeasible and overriding considerations outweigh the significant environmental effects. ([Pub. Res. Code] § 21081; Guidelines, § 15091, subd. (b).) In addition, the agency "shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures" ([Pub. Res. Code] § 21081.6, subd. (b)) and must adopt a monitoring program to ensure that the mitigation measures are implemented ([Pub. Res. Code] § 21081.6, subd. (a)). *The purpose of these requirements is to ensure that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.* (See [Pub. Res. Code] § 21002.1, subd. (b).) [Emphasis in original; footnotes omitted.]

Thus, CEQA requires the City to require or incorporate mitigation measures into the Project that will mitigate or avoid significant environmental effects, and to assure that the mitigation measures are enforceable through permit conditions or other measures, and will actually be implemented.

The mitigation measures stated in the Draft SEIR do not satisfy the requirements of CEQA. The Draft SEIR proposes that the City monitor the situation and then "recommend" appropriate measures in the future, and states that some "possible measures that might be considered" include additional restrictions on on-street parking, implementing a parking permit program, and/or implementing programs to limit access to off-street parking. The Draft SEIR does not require or incorporate any of these mitigations into the Project, nor does it ensure that any of these mitigation measures are actually implemented. Further, the Draft SEIR states that the City in the future will "determine and recommend the responsible party (City or private property owner) for implementing the measure(s)." (Draft SEIR at 34.) However, nowhere in CEQA is there authority for a developer to mitigate the adverse effects of its project on neighboring properties by assigning to the adversely affected neighboring properties the responsibility to implement mitigation measures.

Because the City has not "committed itself to mitigating the impacts" of traffic in the APM Station area and providing adequate parking for patrons of the APM Station, the measures do not satisfy the requirements of CEQA. Federation of Hillside and Canyon Associations, 83 Cal.App.4th at 1262. The Hexagon Traffic Study identifies four measures to mitigate the parking impacts of the Project on neighboring private property:

- (1) Provide sufficient off-street public parking spaces near the APM station;
- (2) Implement programs to limit access to off-street private parking (permit systems, gates, card key access);
- (3) Place usage restrictions on the off-street parking (tow away signs, etc.);
- (4) Work with private property owners to lease unused spaces.

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(Hexagon Traffic Study at 3.) The Draft SEIR should recommend that the City incorporate these measures to mitigate the effects of the Project and assure that the mitigation measures are fully enforceable through permit conditions, agreements, or other measures. (Pub. Res. Code § 21081.6.)

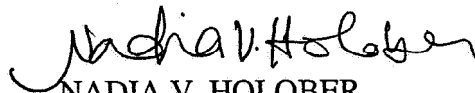
Conclusion

The proposed Draft SEIR should not be certified until all potential environmental effects of the Project have been analyzed and mitigated. For the reasons stated above, we respectfully request the City to conduct further environmental analysis to accurately assess the adverse traffic and parking impacts of the Project in the APM Station Area and to adequately mitigate those impacts. We request the City to implement and fund sufficient off-street public parking spaces near the APM Station; programs to limit access to off-street private parking; usage restrictions on the off-street parking; and procurement by the City of leases of private property for APM parking.

Please do not hesitate to telephone me with any questions or comments.

Very truly yours,

BERLINER COHEN

  
NADIA V. HOLOBER  
E-Mail: [nvh@berliner.com](mailto:nvh@berliner.com)

NVH:cem

cc: Janis Moore, Planning Department (w/encl.)  
Rene Gurza, Esq., City Attorneys' Department (w/encl.)  
Ralph Borelli, Airport IV (w/encl.)  
Russ Filice, Airport IV (w/encl.)  
Linda A. Callon, Esq. (w/encl.)



## Hexagon Transportation Consultants, Inc.

40 South Market Street, Suite 600 • San Jose, California 95113 • Phone (408) 971-6100 • Fax (408) 971-6102

November 21, 2002

Ms. Nadia Holober  
Berliner Cohen  
10 Almaden Boulevard, 11<sup>th</sup> Floor  
San Jose, CA 95113

*Re: Parking and Traffic Study for SJ Airport People Mover*

Dear Ms. Holober

We have completed a parking and traffic analysis for the proposed people mover (APM) to serve San Jose Airport. The analysis used the traffic forecasts and ridership data from the DEIR for the proposed project. Additional parking data were collected from the San Jose International Airport staff, and occupancy surveys were carried out in the APM station area.

The purpose of our analysis was to determine if there would be any demand for cars to park at the APM station and ride to the airport. There are a number of parking lots surrounding the proposed APM terminal. While these are not intended for public use, and many are signed as private parking, they have no physical parking restrictions or active parking management. In essence, there is nothing to prevent APM riders from using these lots. If cars were to park in these lots, albeit illegally, they could avoid parking charges.

### Airport Parking Facilities

In order to determine the parking demand at the people mover, it is necessary to examine airport parking in general. Long-term parking is available in the Orange Lot, located west of the Airport, off of Martin Avenue, between De La Cruz and Coleman Avenue. Free Airport shuttle bus service is provided between the Airport terminals and the long term parking lot. Shuttles operate approximately every five to ten minutes. There are a total of 4,143 parking spaces in the Orange Lot. According to Airport staff, the long-term parking lot is 70-75% occupied on a normal weekday. The long term parking rate is \$1 per 20 minutes with a maximum fee of \$15 per day.

Short-term parking is available at either the parking garage at Terminal A, or in the hourly lot located directly across from Terminal C (Red Lot). There are 2,010 parking spaces available in the parking garage at Terminal A and 710 spaces available in the lot across from Terminal C. The average occupancy rate of the Red Lot is 75-80%, and the parking garage is 50%. The short-term parking rate is \$1 per 20 minutes with a maximum fee of \$30 per day. There are several privately owned and operated parking lots near the airport, for which information is not available.

### Existing Public Transport Facilities to the Airport

VTa provides airport long term parking at many Park & Ride lots. Patrons can park a vehicle for up to seven days for free at select VTA Park & Ride lots. There are almost two hundred and forty designated airport Long-Term Parking

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spaces at the following VTA Light Rail Stations: Almaden, Blossom Hill, Branham, Capitol, Cottle, Curtner, Evelyn, Ohlone/Chynoweth, Santa Theresa, Snell, Tamien. However, these parking lots are 5 to 20 miles away from the airport.

VTA provides a free airport shuttle (Route 10- Airport Flyer) from the Metro Light Rail station on First Street and from the Santa Clara Caltrain Station with 15-minute headways. According to VTA, the existing average ridership of the Airport Flyer is 1,900 passengers per day. According to the DEIR, 14% of these bus riders park and ride the bus. This equates to about 130 cars. Although actual figures are not known, presumably some of these vehicles park in the private lots near the proposed APM station.

### Potential Parking Demand

According to the APM DEIR forecasts for Year 2010, the total number of passengers using the airport per day will be 48,220. Assuming a 50-50% split, there will be 24,110 arriving passengers and 24,110 departing passengers. Departing passengers will use the airport long-term parking and most of the short-term parking. There are 4,143 parking spaces available in the long-term lot and 2,720 spaces in the short-term lots. Assuming 6,143 total spaces used by departing passengers and assuming 2 passengers per car, the number of passengers that can be accommodated in the on-airport parking is 12,286. Assuming 25% of passengers are dropped off (6,028 passengers), that leaves 5,796 passengers who must park off-site or use public transportation.

According to the APM DEIR forecasts, 2,520 passengers are expected to use public transportation, either APM or VTA Bus service. That means 1,260 departing passengers will not need any parking. The result is that 4,546 passengers will need to park off-airport. Since most private lots around the airport charge for parking, the free parking around the APM station will be inviting to many passengers, even though it is signed as private parking. It is reasonable to assume that 500 to 1,000 cars might park in these private lots.

### Parking Occupancy Survey

An occupancy survey was carried out on November 14, 2002, for the unrestricted on-street and off-street parking near the proposed APM station. According to the occupancy survey, the unrestricted on-street parking spaces (total 22) within 5 minutes walk from the APM station were 80% occupied on an average weekday. The DEIR cites 103 unrestricted off-street parking spaces available within 5 minutes walking distance and more than 310 spaces within 10 minutes. However, the field checks discovered that these spaces are also private lots; there are just no signs preventing public use. Thus, essentially there are no available unrestricted public parking spaces near the proposed APM station.

### Parking Conclusions

It would be reasonable to assume that out of 4,546 passengers that would need to find alternative parking/airport access, at least 500 passengers and up to 1,000 passengers would park in the nearby free private parking spaces and use the APM. Even though it is not legal to park in these parking lots, some passengers would use them because they are free and convenient. The chances of private parking being used by airport passengers would be more on the weekends, when the offices are closed.

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The City should take some measures to avoid the potential illegal parking issue. Some of the possible measures that could be considered are:

- (1) Provide sufficient off-street public parking spaces near the APM station,
- (2) Implement programs to limit access to off-street private parking (permit systems, gates, card key access)
- (3) Place usage restrictions on the off-street parking (tow away signs, etc)
- (4) Work with private property owners to lease unused spaces.

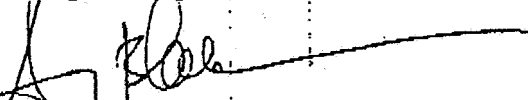
### Traffic Implications

Cars using the private parking lots near the APM station would add traffic to the nearby streets and intersections. Based on the estimates described above, the number of added vehicle trips would be 500 to 1,000 per day. Using typical peaking factors, this calculates to 50 to 100 peak-hour trips during the morning and afternoon peak hours. The traffic analysis in the DEIR should be redone with these trips added.

Please contact us if you have any questions about this analysis.

Sincerely,

Hexagon Transportation Consultants, Inc.



Gary K. Black  
President

**RESPONSES TO COMMENT #14:**  
**BERLINER COHEN**

**RESPONSE TO COMMENT 14-A**

Please see the responses to the detailed comments, below.

**RESPONSE TO COMMENT 14-B**

As noted in this comment, the projected APM ridership shown in Table 5 of the Draft SEIR is based on a technical ridership report dated 6/14/02 by Dowling Associates. The ridership numbers shown in the SEIR are Dowling's "2010 Design Day" projections (Table 5.2, page 15, in the Dowling Report). The use of the design day projections is standard procedure in infrastructure planning and accompanying EIRs.

There is no requirement under CEQA to analyze special circumstances such as event occurrences at the San Jose and/or Santa Clara Convention Centers because they do not represent the impacts that would normally and routinely be expected. Analogies of this practice include the following: 1) traffic analyses for shopping centers are not based on Christmas peaks, 2) traffic analyses for freeways are not based on holiday or 3-day weekend peaks, and 3) traffic analyses for airports are not based on holiday travel peaks.

The above paragraphs notwithstanding, the comment's assertion that the SEIR underestimated traffic impacts associated with APM ridership is incorrect. This is because the projected number of APM patrons who will drive to the North First Street Station is the same (i.e., 300 per day) under both the "2010 Design Day" and "2010 Design Day plus Convention" scenarios. The only difference between these two scenarios is the number of patrons who will walk to the APM station or transfer to the APM from the LRT (Table 5.2, page 15, in the Dowling Report).

**RESPONSE TO COMMENT 14-C**

This comment asserts the SEIR's conclusion that parking impacts are speculative is inadequate under CEQA because the City has failed to adequately analyze the issue. To support this assertion, the comment cites apparent contradictions between the Dowling Report and the SEIR's traffic analysis (the "Korve Report"), as well as the conclusions of a traffic consultant hired by the commentor (the "Hexagon Report"). This response addresses each of these issues.

### SEIR Methodology

The assertion that the City declined to analyze potential parking impacts is incorrect. The SEIR analyzed this issue from both the parking supply and the parking demand perspectives. With regard to parking supply, extensive parking surveys in the vicinity of the North First Street Station were conducted (see Chapter 3 and Appendix A of the Kolve Report). The surveys quantified parking supply, parking occupancy, type of parking (e.g., on-street, off-street, unrestricted, restricted, etc.), and walking distance/walking time to the Station.

With regard to the potential demand for APM patrons to utilize parking in the vicinity of the North First Street Station, the City took existing and future conditions into account. Existing conditions were deemed to be an important indicator of future parking demand because the existing *Airport Flyer* bus provides frequent, no fare, direct service to SJC from the Metro/Airport LRT Station (the site of the proposed APM/LRT station). In addition, existing parking supplies at the Airport are inadequate and on-Airport traffic congestion is substantial. These on-Airport conditions, coupled with the convenient and free bus service from North First Street, are factors that might lead an Airport passenger or employee to park near North First Street in order to avoid the cost and frustration associated with parking at SJC. Despite conditions being "ripe" for this phenomenon to occur, there is no evidence that it is presently occurring.

The comment attempts to refute this conclusion by claiming that the Dowling Report says that "approximately 14% of current *Airport Flyer* passengers drive their vehicles to the *Airport Flyer* station and park for free". This misstates the Dowling Report. The Dowling Report (page 4) clearly states that most of the 14% were Airport employees who drove to the employee lot (on the west side of the Airport) and used the *Airport Flyer* instead of the employee shuttle bus. The Dowling Report contains no data that indicate *Airport Flyer* patrons are parking near North First Street, a conclusion consistent with the Kolve Report.

In light of the findings regarding existing parking demand, the City's experts concluded there was no logical and reasonable basis for quantifying future demand. The degree to which such future parking demand might materialize is further diminished when the planned increase in the on-Airport parking supply and on-Airport roadway upgrades are taken into account.

### Hexagon Report

This comment includes an independent analysis by Hexagon Transportation Consultants (the "Hexagon Report"), which concludes that the SEIR underestimated vehicle trips and parking demand in the vicinity of the proposed North First Street Station. A review of the Hexagon Report indicates that its conclusions are based on the underlying assumption that Airport users will park near the North First Street Station because there is insufficient on-Airport parking (Hexagon Report, page 2). Hexagon concludes that the North First Street area would be an inviting choice for parking in view of the substantial on-Airport shortage.



This underlying assumption in the Hexagon Report is erroneous because it is based solely on the *existing* on-Airport parking supply and neglects to account for planned increases in parking. Specifically, under the *Master Plan*, on-Airport public parking will increase to 12,700 spaces (SEIR, page 4), which is more than double the existing supply. This increase in parking will be more than adequate to accommodate the 2010 parking demand forecasted by Hexagon.

In light of the above, there is no basis to conclude that the SEIR analysis is inadequate under CEQA.

#### **RESPONSE TO COMMENT 14-D**

In an effort to provide the public and decision-makers with the full and complete "parking environment picture" in the vicinity of the North First Street Station, both on-street and off-street parking supplies were identified. The SEIR notes, and this comment does not dispute, that there are 80 unrestricted on-street parking spaces within a 10-minute walk of the APM station. Given the lack of evidence that APM-related demand for either on- or off-street parking exists (see Response to Comment 14-C, above), the concerns that private off-street parking will be impacted have no basis in fact.

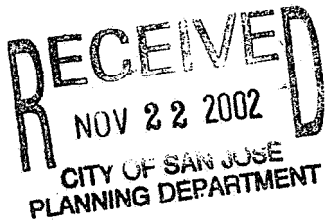
The above conclusion notwithstanding, in an effort to be proactive, the City has committed (SEIR, page 34) to monitoring the parking situation and to take appropriate action if a problem were to materialize. Such an approach is consistent with City practice in other locations, such as the business and residential neighborhoods in the vicinity of the HP Pavilion/San Jose Arena.

#### **RESPONSE TO COMMENT 14-E**

This comment requests consideration of mitigation measures to address the significant parking and traffic impacts of the proposed APM project. For the reasons described in the above responses, the City disagrees with the commentor's assertion that significant impacts will occur. Since there is no factual basis to conclude that significant traffic or parking impacts will occur, no mitigation is required under CEQA.

#### **RESPONSE TO COMMENT 14-F**

For the reasons described in the above detailed responses, the City disagrees with the commentor's conclusion that the Draft SEIR has not adequately analyzed all potential environmental effects.



David Pandori  
184 Hobson Street  
San Jose, California

COMMENT  
# 15

November 22, 2002

Planning, Building, and Code Enforcement Department  
c/o Janice Moore  
San Jose City Hall, Room 400  
801 North First Street  
San Jose, California 95110

Re: Comments on the Draft Supplemental EIR – San Jose International Airport  
Master Plan Update EIR

Thank you for the opportunity to submit comments. Having previously served on the city council during the review of the original EIR, I feel obligated to ensure that the community receives complete and accurate information on airport noise impacts. The noise projections in the original EIR were quite controversial; they have now been proved to be highly inaccurate. Thousands of homes are now projected to be impacted by airport noise.

While the draft EIR may be providing more accurate noise information, the analysis is incomplete when compared to the original 1997 EIR. Without updating all the airport noise analysis, the EIR should not be certified as complete. It will still contain information that the city *knows* to be inaccurate without any indication as to what the true impacts are. ] A

Many of the comments below are oriented simply to updating all of the noise analysis in the original EIR. ]

1. Each of the Alternatives Evaluated in the Original Airport EIR/EIS should be evaluated for their noise impacts.

The 1997 EIR/EIS considered three alternatives described as Project Case, Project Case Alternative A and Project Case Alternative B. Also included was the No Project Alternative. The supplemental EIR only evaluates the impacts of the Project Case and the No Project Alternative. The City should evaluate the noise impacts for each of the alternatives considered in the EIR/EIS. The City Council should have comparative information on the relative environmental impacts of each alternative originally considered. CEQA and NEPA require consideration of the environmental impacts of the project and the alternatives. ] B

It is also important to evaluate the noise impacts for the interim benchmarks of expansion, as with the original EIR. Those allowed the City to determine in the Year 2000 whether the projects were faulty. The EIR should project interim noise levels again, as did the original. ] C

2. Analysis and Comparison of Alternatives and Environmentally Superior Alternative

As required under CEQA Guidelines, and EIR must discuss a range of reasonable alternatives to a proposed project that would feasibly attain most of the basic objectives of the project while avoiding or lessening significant environmental effects. The CEQA Guidelines require that and EIR identify an "environmentally superior alternative." If the No Project Alternative is considered environmentally superior, then the Draft EIR must identify any alternative among the others that is environmentally superior. In order to accomplish this, the relative environmental impacts of the alternatives need to be evaluated. Because the noise impacts are significantly different, the noise impacts for each of the alternatives must be considered.

3. Provide noise level information during particular time periods.

It is important to understand the noise levels projected during particular hours of operation under each of the alternatives being evaluated in the EIR. The information should already be available. In calculating the CNEL, I understand that under State law the consultant is required to make separate projections for noise levels during three time periods: 7am to 7pm, 7pm to 10pm, and 10pm to 7am. Pursuant to State regulation, noise in early morning and late evening hours, because of its more intrusive nature, is treated differently than daytime noise.

Using this data, which the noise consultant must already have taken into account, please provide the hourly noise levels for the hours that the Airport is in operation (6:30am to 11:30pm). Please provide this information for each of the alternatives in the EIR using the Year 2010 horizon.

This information is important to the community because the CNEL does not reflect actual noise levels generated during hours of airport operation because it averages in the minimal noise generated when the airport is not in operation during curfew hours.

4. Time Above Analysis for the 65 dB Threshold

As stated in the First Amendment to the 1997 EIR, the time above 65 dB analysis is an alternate method of describing noise levels that would interfere with outdoor activity, like talking to someone. It describes the amount of time per day that it will be so noisy outside that it will be difficult to talk to person.

This analysis was completed in the First Amendment to the EIR. (See First Amendment to the 1997 Draft EIR, pp. 32-37.) The analysis occurred after it was pointed out that the noise consultant hired by the city had completed this type of analysis for the Oakland Airport EIR, but failed to do so for the San Jose Airport EIR/EIS.

Given the significant change in noise projections, the City should update the inaccurate 65dB Time Above Analysis contained in the First Amendment to the EIR.

5. Updated Noise Contours When Primarily Southern Departures Occur

In the First Amendment to the EIR noise contours were projected for that time of the year when departures are primarily to the south. This was a major concern for many residents because noise impacts change drastically when airport departures routinely are directed to the south. The Airport estimates that southern departures occur 15% of the year. That means for about two months of the year, San Jose residents experience sharply different noise impacts.

As a result, the city generated noise contour maps for that situation. In view of the inaccurate data that those maps were based on, the maps should be updated.

6. Off-Airport Historic, Architectural and Aesthetic Impacts

The original EIR recognized that a significant impact to a historic properties could occur with the implementation of the ACT program. The EIR found that the sound attenuation measures of the ACT program can compromise the historic or architectural integrity of the property. The EIR identified specific properties of historic or architectural significance within the projected impact area. EIR, p. 3.2-10. Because of the significant increase in noise impacts, there is a wider geographic area that needs to be surveyed for similar properties. The Supplemental EIR should include this evaluation.

7. Evaluate as a mitigation measure runway restrictions on Runway 30R.

The draft Supplemental EIR recognizes in passing aircraft operational programs can serve to mitigate noise impacts. EIR, p 51. Changes in flight procedures can be effective in noise mitigations. The City should determine the environmental benefits of limiting the use of Runway 30R to those times when Runway 30L is closed for repairs and for emergency purposes. *This mitigation measure could only be approved by the federal government.*

Because Runway 30L is closer to the center of the airfield, such a restriction would minimize noise being shifted 750 feet to the east over downtown neighborhoods and the central business district through the use of Runway 30R. The proposal would have a minimal effect on overall capacity of the airport. However, the measure should have significant environmental benefits.

The EIR documents that aircraft departures are projected to substantially increase on Runway 30R. The EIR projects that about 72% of all air carrier departures will occur on Runway 30R, up from the current level of 42%. Departing aircraft generate much more noise than arriving aircraft. The shift of this activity to the east is a major contributing factor to the additional noise impacts in the Washington-Guadalupe neighborhood.

The primary purpose for Runway 30R is to provide a back-up for runway 30L during its repair reconstruction. Because the runways cannot be used simultaneously, there is minimal capacity benefit. *As stated in the 1997 Airport Master Plan, the extension of Runway 30R provides only a 2% increase in the Annual Service Volume.* (Airport Master Plan, p. 5-1.)

This restriction on the use of Runway 30R was approved by the City previously. In 1986 the City recommended implementation of this procedure to the FAA as part of the FAR Part 150 Noise Compatibility Program (NCP) that was completed. The 1986 NCP sought to limit use of Runway 30R to those times when Runway 30L was closed for repair and/or emergency needs.

FAR Part 150 regulations expressly allow for restrictions regarding "flight procedures." (See, e.g., Federal Aviation Regulations §§150.23(c), 150.33(a).) They include, among other measures, restrictions concerning runway use. If approved by the FAA, the flight controllers are bound to follow them.

As indicated above, the City applied for a restriction limiting jet operations on Runway 30R to those times when Runway 30L was "closed for repair and/or emergency." Although in its Record of Approval, the FAA did not approve the runway restriction in 1987 (along with the airport curfew), it was not for substantive reasons. The FAA wrote:

"The FAA recognizes that this is a continuation of an existing practice at the airport. However, the documentation [submitted by the City] does not contain sufficient information to determine the noise benefits of this measure in accordance with Part 150 standards or to determine what extent operational considerations are influencing the designation of runway use. Runway use assignment for noise reasons alone should be based on aircraft noise levels, rather than aircraft type (such as 'jets'), in order to avoid the potential for unjust discrimination since some jets are quieter than non-jets." (FAA Record of Approval, 10/1/87.)

The Record of Approval goes on to indicate the FAA's willingness to work with the City to achieve a non-discriminatory restriction.

Implementation of this procedure could offer significant environmental benefits, minimize noise impacts in neighborhoods, and save the city millions of dollars in noise attenuation program costs.

8. Mitigation Measure – Phase Out Stage Three Aircraft That Are Noisier than Stage 2 Aircraft

Stage 2 operations were phased out in the Year 2000 at San Jose International Airport pursuant to the Airport Noise and Capacity Act, leaving generally quieter Stage 3 aircraft. However, there is not a consistent difference between Stage 2 and Stage 3 aircraft in terms of noise. Some Stage 3 aircraft still operating at San Jose Airport are noisier than Stage 2 aircraft that have been eliminated. For example, the McDonnell Douglas DC 10-30, a Stage 3 aircraft, generates a

November 22, 20022

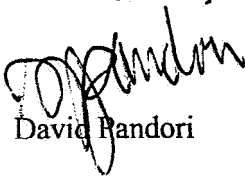
Page 5

maximum EPNdB of 104.4. In contrast, the Boeing 737-200, a Stage 2 aircraft, generates a maximum EPNdB of 97.7.

The city should determine the environmental benefit of phasing out those Stage 3 aircraft with noise levels that exceed the phased out Stage 2 aircraft.

Thank you for the opportunity to submit these comments.

Sincerely,



David Randori

**RESPONSES TO COMMENT #15:**

**DAVID PANDORI**

**RESPONSE TO COMMENT 15-A**

Please see the responses to the detailed comments, below.

**RESPONSE TO COMMENT 15-B**

In 1997, the City Council adopted the Project Case, and rejected Alternatives A and B. The upgrade and extension of Runway 12L/30R to 11,050 feet for full air carrier use, unique to the Master Plan Project Case, was completed in 2001. Alternative B did not include any extension to this runway, and Alternative A only included a shorter extension to the runway. As such, analysis of Alternatives A or B in this SEIR would be irrelevant and meaningless because they would entail circumstances that pre-date existing conditions.

**RESPONSE TO COMMENT 15-C**

In the original EIR, interim analysis years were shown due to the relatively long period of time between anticipated project approval (1997) and master plan buildout (2010). In addition, the interim years were shown to illustrate the effect of the 12/31/99 Stage 2 aircraft phaseout and the upgrade of Runway 30R to an air carrier facility, events which have now transpired. Given these facts, an interim analysis would not show any new impacts not already disclosed in the 2010 noise analysis contained in the SEIR. [Note: This conclusion was verified by comparing the recently-concluded NEM for calendar year 2006 to the 2010 *Master Plan* contours shown in the SEIR. The contours in both scenarios are similar.]

**RESPONSE TO COMMENT 15-D**

The CEQA guidelines referenced in this comment are applicable to EIRs on not-yet-approved projects. In this case, as noted in Response 15-B, the *Master Plan* was approved in 1997 and construction on many *Master Plan* projects has been completed or is underway. For these reasons, the analysis of other "build" alternatives in the SEIR is not required or relevant.

**RESPONSE TO COMMENT 15-E**

Calculation of the CNEL requires that one take into account the time of day that the noise event occurs. This is because the CNEL, by definition, assigns greater emphasis on noise occurring during the evening (7-10 p.m.) and nighttime (10 p.m. to 7 a.m.) periods, since those are the times when people's sensitivity to noise is higher. This does not mean, however, that the noise from these separate time periods is reported separately. To do so would depict an incomplete and inaccurate picture of the total noise environment. The CNEL is designed to provide the public and decision-makers with the complete picture, and is the standard used at all airports in California in accordance with both State and Federal law.

The use of the CNEL is analogous to the use of the day-night level (Ldn) by the City when quantifying non-aircraft noise levels throughout the community. The Ldn presents the total noise environment for a typical day, taking into account the time of day the noise events occur.

**RESPONSE TO COMMENT 15-F**

The time above 65 dBA has been calculated, as requested. Please see the modified version of the time-above table in Section 3 of this document.

**RESPONSE TO COMMENT 15-G**

While hypothetical noise contours for southern departures were provided in the First Amendment to the original EIR, such contours were accompanied by text that clearly indicated that they were misleading, were not based on scientific rationale, and could not be compared to any federal, state, or local land use compatibility standard (1st Amendment, page 40). The text of the First Amendment goes on to say that such contours "do not reflect a valid methodology for measuring noise impacts at SJC" and "do not comply with the procedures set forth by the FAA or the State of California" (1st Amendment, page 45).

For the reasons set forth above, a hypothetical "southern departure" contour is not provided in this SEIR. Although such contours were provided on a one-time basis, repeated depiction of an unrealistic scenario would promulgate misleading and unscientific information.

**RESPONSE TO COMMENT 15-H**

This information has been provided as requested. Please see Section 3 of this document.



**RESPONSE TO COMMENT 15-I**

This mitigation measure was evaluated in the original EIR; see page 3.5-104. The EIR concluded that, although such a restriction could reduce noise, it would reduce the hourly air carrier operational capacity of the airfield, as well as the airfield's annual service volume. The EIR also concluded that such a restriction would be inconsistent with the project objectives and would eliminate the need to extend Runway 12L/30R to air carrier length. Finally, the EIR concluded that such a restriction would not likely be approved by the FAA once the runway was extended. For these reasons, this mitigation measure was not adopted.

This comment notes that restrictions on the use of Runway 30R were recommended by the City back in 1986 as part of a FAR Part 150 Study. As noted by the commentor, such restrictions were not approved by the FAA. In any event, such recommendations were subsequently superseded in 1997 when the City Council approved the *Master Plan*, including the recently-completed extension of Runway 12L/30R to 11,050 feet.

**RESPONSE TO COMMENT 15-J**

The statement that some Stage 3 aircraft are noisier than certain Stage 2 aircraft is inaccurate. The FAA certifies aircraft as being Stage 3 compliant based on standards described in FAR Part 36. Such standards take into account the *overall* noise signature of a given airplane type, including takeoff, sideline, and approach noise levels. Certification standards are also weight-dependent and take into account the number of engines on an airplane. Under the FAA regulations, it is possible, for example, for a given Stage 3 aircraft to have higher approach noise levels than some Stage 2 aircraft. However, the *overall* noise level of that Stage 3 aircraft would be less than that of Stage 2 aircraft.

Department of Planning, Building, & Code Enforcement **RECEIVED** Section 2 - Responses to Comments  
Attn: Janis Moore  
C/o San Jose City Hall  
801 North First Street, Room 400  
San Jose, CA 95110

**COMMENT #16**  
DEC 02 2002  
CITY OF SAN JOSE  
PLANNING DEPARTMENT

I am writing to express my concerns about airport noise and other airport by-products affecting my neighborhood (Vendome, District 3). I was made aware (on Sunday Nov 24<sup>th</sup>) that I had to get my comments in by Nov 22<sup>nd</sup>. I realize I'm over the deadline, and in my defense, I had no idea the timeframe I was up against. *It seems fair to say that if public input is requested (as it should be), then a fair window of time needs to be granted for us to provide comments.* **A**

I am writing to address three issues - I have called about the first two on several occasions:

- the horrific noise generated during curfew hours
- the noxious smell generated by airplane fumes
- traffic concerns due to airport expansion without traffic calming analysis

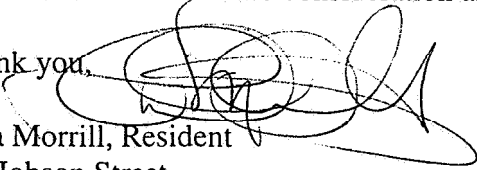
Noise and smell: The noise generated during curfew hours is and continues to be an ongoing source of distress, and it seems to have gotten worse. Additionally, noise outside curfew hours has increased over the past couple of years, to a point I find it difficult to study and work during day/evening hours. (I telecommute 2 days a week - a great alternative to clogging our freeways on a regular basis.) Planes fly overhead and my windows shake and rattle. I cannot converse on the telephone when a plane flies overhead (during cloudy or windy days.) because I can't hear, nor can the other person hear me. And this is while inside my home. As a homeowner I would like the benefit of enjoying my yard. Outside activities are difficult with the increased noise, and noxious smell. *These conditions are working contrary to the city's wishes of wanting people to live, work, and play in downtown.* **B**

**An evaluation needs to be done about each and every neighborhood affected by the intrusive noise level and potential adverse health impacts. The evaluation needs to be thorough and honest so that a fair and accurate evaluation and conclusion can be drawn.**

Airport expansion: Rushing to airport expansion without complete analysis is irresponsible; to neighborhoods, to potential passengers, and freeway/street drivers. Surrounding neighborhoods must be taken into consideration as they are the ones impacted. (By the way, these same residents are the ones living in, paying property taxes in, and spending money in our city.) Existing /expansion of light rail should be utilized to provide relief of neighborhood impact. The airport is the one who needs to pay for transit improvements. Being an ordinary citizen, I don't understand a lot of the terminology and legalese currently being bandied about, but what I do understand is that a former agreement is about to be broken under the guise of security/safety. The facts as I understand them is that security considerations can be implemented NOW and do not need \$1.5 million in funds to be allocated toward a March vote. **C**

Please take this letter into consideration as you work to understand the airport impact.

Thank you,

  
Tina Morrill, Resident  
50 Hobson Street  
San Jose CA 95110

**RESPONSES TO COMMENT #16:**

**TINA MORRILL**

**RESPONSE TO COMMENT 16-A**

Per the requirements of CEQA, the Draft SEIR was made available for public review and comment for a 45-day period beginning on October 9, 2002 and ending on November 22, 2002. A *Notice of Availability of the Draft SEIR* was published in the San Jose Mercury-News on October 9th.

**RESPONSE TO COMMENT 16-B**

The Draft SEIR contains a comprehensive noise analysis for all affected neighborhoods, including the Vendome Neighborhood. As noted in the Draft SEIR, many of the homes within the Vendome Neighborhood are eligible for the ACT Program.

The air quality aspects of the *Airport Master Plan* were addressed and quantified in the original 1997 EIR.

**RESPONSE TO COMMENT 16-C**

The Airport expansion, as embodied in the approved *Airport Master Plan*, has been the subject of extensive study and numerous public meetings since 1988. The multi-year planning and environmental evaluation process concluded with the approval of the *Airport Master Plan* by the City Council in 1997, followed by FAA approval in 2001. Following the approval of the *Airport Master Plan*, numerous community meetings were held throughout the City for the purpose of soliciting input on the Airport expansion, with emphasis on transportation/transit access. This entire process is documented in Section 1.1 of the original EIR and Section 1.3 of the Draft SEIR.

This comment makes reference to the upcoming March 2003 ballot measure pertaining to proposed construction to accommodate security requirements. That subject is not related to issues that are addressed in this SEIR.

## SECTION 3. REVISIONS TO TEXT OF DRAFT SEIR

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### Change to Table 14

Table 14 has been revised to include the time above 65 dBA. The revised table is shown on the following page. [Note: The data in Table 14 are expressed in minutes per day. In the Draft SEIR, the data had mistakenly been entered as percentage of the day.]

### Modification to List of Historic Properties within 65 CNEL Contour

Table 3.2.1 of the original 1997 EIR listed historic properties located within the projected 2010 65-dB CNEL contour. Since the updated *Master Plan* noise analysis contained in Section 2.2.2 of the Draft SEIR projects a larger noise contour than that shown in the original EIR, additional historic properties will be within the 65-dB CNEL contour. Those additional properties are located within San Jose at the following addresses:

Street Name	Address Number
South Almaden Avenue	486, 496, 507, 508, 516, 518, 520, 522, 524, 565, 582, 586, 589, 598, 729, 848
Balbach Street	145, 160
Colton Place	137
Locust Street	533
Pierce Avenue	64, 68, 76, 82, 89, 93, 105, 107, 109, 128, 132, 135, 140
West Reed Street	86
State Street	747, 748, 749
Union Street	84
Vine Street	515, 527, 533, 541, 547, 553
Viola Avenue	126, 132, 162
West William Street	77, 84, 98, 102, 119, 120, 124, 125, 129, 131, 133, 135, 136
Source: Historic Resources Inventory, City of San Jose, 2002.	

T A B L E 1 4

## COMPARISON OF TIME ABOVE 65, 75, AND 85 dBA

Refer- ence Location	Time Above 65 dBA			Time Above 75 dBA			Time Above 85 dBA		
	Exist- ing	No Project	Master Plan/ Year 2010	Exist- ing	No Project	Master Plan/ Year 2010	Exist- ing	No Project	Master Plan/ Year 2010
1	98.1	97.7	102.5	32.2	31.9	36.7	2.8	2.8	3.2
2	89.0	89.3	95.4	20.8	21.6	22.0	0.7	0.8	1.0
3	94.7	94.1	99.7	27.7	27.5	31.3	1.9	1.8	2.4
4	87.3	89.8	92.8	21.1	22.8	20.1	0.5	0.7	0.8
5	87.2	88.1	87.8	20.1	23.7	22.9	2.3	3.5	3.0
6	93.5	91.6	90.8	30.5	26.1	25.8	1.2	1.0	1.2
7	90.8	90.4	90.5	30.6	29.5	26.5	0.2	0.2	0.2
8	86.0	88.6	92.3	20.7	22.4	16.9	0.2	0.4	0.4
9	74.2	77.8	80.0	14.8	16.6	10.7	0.2	0.2	0.3
10	58.9	64.0	63.8	4.8	7.6	4.9	0	0.1	0.1
11	85.4	85.7	85.1	22.5	22.3	19.0	0	0	0.1
12	38.0	35.8	29.0	1.6	1.4	1.8	0	0	0
13	133.6	152.8	155.9	16.1	25.2	15.0	0.1	0.1	0.1
14	50.3	46.8	48.2	9.5	8.7	4.9	0.1	0.1	0
15	73.2	73.1	71.9	5.5	5.1	3.1	0	0	0
16	36.9	40.5	29.9	0.6	0.7	0.7	0	0	0
17	51.8	56.6	44.0	0.9	1.2	1.0	0.1	0.1	0.1
18	6.3	5.5	8.4	0.5	0.3	0.5	0	0	0
19	9.9	10.7	14.7	1.2	1.4	1.9	0	0	0
20	43.2	46.3	37.5	2.9	3.8	2.3	0	0	0

Data are shown in minutes per day.

Reference grid locations are shown on Figure 11.

**Source:** Brown-Buntin Associates, 2002.